

EXHIBIT 1

ANTHONY EID
July 21, 2021

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN

ANTHONY EID, an individual,

Plaintiff,

vs. Case No. 20-cv-11718

Hon. Gershwin A. Drain

WAYNE STATE UNIVERSITY, et al, Mag. Judge David R. Grand

Defendants.

The Deposition of ANTHONY EID,
Taken at 280 North Old Woodward Avenue,
Suite 400, Birmingham, Michigan,
Commencing at 9:38 a.m.,
Wednesday, July 21, 2021,
Before Lezlie A. Setchell, CSR-2404, RPR, CRR.

ANTHONY EID
July 21, 2021

1 APPEARANCES:

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24 ALSO PRESENT:

25 Kristen Cook, Adrienne Wolff

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1 Birmingham, Michigan

2 Wednesday, July 21, 2021

3 9:38 a.m.

4 ANTHONY EID,

5 was thereupon called as a witness herein, and after

6 having first been duly sworn to testify to the truth,

7 the whole truth and nothing but the truth, was

8 examined and testified as follows:

9 exam

10 MS. HARDY: Let the record reflect that

11 this is the discovery deposition of Anthony Eid in the

12 case of Eid versus Wayne State University, et al,

13 currently pending in the Federal District Court in the

14 Eastern District of Michigan. This deposition is

15 being taken pursuant to the Notice, agreement of the

16 parties and can be used for all purposes provided

17 under the Federal Court Rules.

18 EXAMINATION

19 BY MS. HARDY:

20 Q. Good morning, Mr. Eid. I represent all of the

21 defendants in this action, and we have gathered today

22 for the purpose of asking you questions about the

23 factual support that you have for the allegations you

24 have made in this lawsuit. You are under oath; do you

25 understand?

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1 A. Yes.

2 Q. Do you understand the significance of that?

3 A. Yes.

4 Q. Alright. And you are making a commitment to answer
5 truthfully under oath?

6 A. I am.

7 Q. Alright. Have you ever been deposed before?

8 A. I have not.

9 Q. Have you ever given sworn testimony?

10 A. No.

11 Q. So you've never been in any kind of arbitration or
12 court proceeding where you've had to testify as a
13 witness; is that true?

14 A. Yes, I have never been in any court proceeding or
15 anything like this.

16 Q. Alright. Well, let me just go over a few ground rules
17 before we get too far down the road. If you've never
18 been deposed before, I'm sure your attorneys have
19 given you kind of the lay of the land, but it's very
20 important that you listen carefully to the questions,
21 that you make sure you understand the question before
22 you answer, you take time to reflect, because once you
23 provide an answer, it will be presumed that you had
24 sufficient time to think about your answer and you
25 understood what you were answering, okay?

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1 MR. ROSSMAN: Don't answer that. That's
2 not framed as a question. I'm going to object to that
3 statement on the record. It's compound. I mean,
4 you're putting a lot in there. We've explained to the
5 witness what to expect in the deposition and the rules
6 about listening and not talking over each other. If
7 we have objections, we'll discuss it and then he'll
8 answer the question unless I tell him not to proceed.

9 MS. HARDY: Alright. We're still going to
10 cover my ground rules because it's my deposition.

11 MR. ROSSMAN: I have no objection to that.
12 I just don't want them framed in the form of a
13 question because as you can tell, he didn't know how
14 to answer because he wasn't sure if it was a question
15 or a statement, and it was very compound.

16 BY MS. HARDY:

17 Q. Do you have any question about that basic proposition
18 that you need to listen carefully, you need to ask me
19 to clarify if you don't understand because once you do
20 answer, it will be presumed that you understood and
21 had sufficient time; is anything unclear about that?

22 MR. ROSSMAN: I'm going to object to the
23 form of the question.

24 MS. HARDY: Okay, thank you.

25 BY MS. HARDY:

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1 Q. Anything unclear about that?

2 MR. ROSSMAN: If you understand that
3 question, you can answer it.

4 BY MS. HARDY:

5 Q. If you don't understand it, I'll take more time to
6 explain it. If you do understand it, then just
7 indicate that you understand that.

8 MR. ROSSMAN: We're not going to get into
9 what he's covered with counsel. You're instructing
10 the witness, and it can't be done in the form of a
11 question. If you want to state your instructions,
12 state them.

13 BY MS. HARDY:

14 Q. Do you understand it's your obligation to ask me to
15 clarify a question if you don't understand it before
16 you answer it?

17 MR. ROSSMAN: Objection; that calls for a
18 legal conclusion. If he's confused by a question,
19 he'll indicate he's confused and ask it to be
20 restated.

21 MS. HARDY: It's going to be a really long
22 day.

23 MR. ROSSMAN: It is if you're going to be
24 questioning him on the rules of a deposition. Just
25 ask him questions.

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1 MS. HARDY: This is the first time I have
2 ever had a debate at this phase of just going over
3 ground rules for a deposition. I have never --

4 MR. ROSSMAN: You can go over them. Just
5 don't ask them in the form of a question, please.

6 MS. HARDY: I need him to acknowledge that
7 he understands so that when we start, I can be sure
8 that we're proceeding with a common understanding of
9 what the ground rules are.

10 MR. ROSSMAN: You're doing it so that if
11 you impeach him at trial later, you can say, Sir,
12 didn't I ask you earlier in the deposition whether you
13 understood all the rules of testimony. That's why
14 you're doing this. He's here. He's represented by
15 attorneys. He's presumed to understand the rules of a
16 deposition. If you want to go over them again with
17 him, go ahead, but don't make a bunch of legal
18 conclusions and then ask him if he understands.

19 MS. HARDY: I'm going to ask the questions
20 I'm going to ask. You are obviously entitled to do a
21 form objection whenever you think that's appropriate,
22 and if he refuses to answer, which of course he can't
23 refuse to answer just because of a form objection,
24 that's on him and on you, and then I'll proceed and
25 move on. I'm not going to sit and go over and over

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1 the same thing.

2 MR. ROSSMAN: Fair enough.

3 MS. HARDY: Okay.

4 BY MS. HARDY:

5 Q. So you understand that, and tell me if you don't, that

6 if you don't understand one of my questions, it's your

7 obligation to ask me to clarify?

8 MR. ROSSMAN: Object to the form.

9 BY MS. HARDY:

10 Q. Go ahead and answer.

11 A. Yes, I think I do.

12 Q. Okay. Do you have some doubt about that?

13 MR. ROSSMAN: Object to the form.

14 BY MS. HARDY:

15 Q. You said I think I do. Is it yes or no?

16 MR. ROSSMAN: Object to the form;

17 confusing.

18 BY MS. HARDY:

19 Q. Do you understand that it's your obligation to ask for

20 a clarification if my questions are unclear before you

21 answer?

22 A. Yes.

23 Q. Thank you. Do you understand that it's important to

24 make sure that I finish a question before you answer,

25 and likewise, I will do my best to make sure you

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1 finish your answer before I begin another question?

2 MR. ROSSMAN: Object to the form and not
3 only is that vague and ambiguous, it's harassing and
4 patronizing. We're not going to talk over each other
5 and you're going to ask him if he understands that's
6 an obligation. He understands that. I have told him.
7 You have told him. I'm not going to sit here and let
8 you patronize this witness.

9 MS. HARDY: I have never heard anyone
10 describe that as patronizing.

11 MR. ROSSMAN: I have never heard that
12 question asked in 21 years of doing this. You tell
13 the witness the instructions, and you move onto the
14 merits of the case. You don't ask him if it's his
15 obligation. Also, I'm not aware of any affirmative
16 obligation in any rule or law that requires him to do
17 that. He's here to answer properly framed questions,
18 and I'm just here to make sure that they're properly
19 framed. That's it.

20 BY MS. HARDY:

21 Q. Okay. So I'm going to assume unless I hear otherwise
22 from you that you understood my questions, you asked
23 for clarification if you didn't understand my
24 questions, and I am going to assume you understand
25 that you're not supposed to speak over me, and if

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1 there's something that I've got wrong about that
2 equation, let me know, and if not, I'll move on.

3 Shall I move on?

4 A. Yes, we can move on.

5 Q. And you need to answer verbally, not nod your head; do
6 you understand that?

7 A. Okay.

8 Q. Alright. Are you taking any medications today?

9 A. Yes, I am.

10 Q. What are you taking?

11 A. I am taking Bupropion.

12 Q. What is that?

13 A. It is an antidepressant.

14 Q. How long have you been taking that drug?

15 A. I believe for -- I've been taking this specific drug
16 for about two months.

17 Q. Who prescribed it?

18 A. My primary care doctor.

19 Q. Who is that?

20 A. You know, I cannot remember her name at this time.

21 Q. Where does she practice?

22 A. She practices out of the, the Detroit City Integrated
23 Health Department.

24 Q. Have you provided a HIPAA release for that particular
25 physician?

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1 A. I have.

2 Q. And so you've been taking this antidepressant for two
3 months?

4 A. Yes.

5 Q. What dosage are you taking today or did you take in
6 advance of the deposition?

7 A. Can you clarify the question?

8 Q. What dosage of the medication, 5 milligrams, 10
9 milligrams, what dosage?

10 A. I am not sure of the dosage.

11 Q. You don't know what dosage you took this morning?

12 A. No, not off the top of my head.

13 Q. Well, is there a prescribed dosage that you're
14 supposed to take every morning?

15 A. There is on the bottle.

16 Q. Do you know what that is?

17 A. No, I do not.

18 Q. So you have no idea whether you have taken more or
19 less than the prescribed dosage today?

20 MR. ROSSMAN: Object to the form of the
21 question; confusing.

22 BY MS. HARDY:

23 Q. Is that correct?

24 MR. ROSSMAN: Speculative.

25 THE WITNESS: Can you repeat the question?

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1 BY MS. HARDY:

2 Q. Sure. I'm trying to figure out whether you took the
3 standard dosage of your antidepressant medication
4 before the deposition today. Do you know whether you
5 took what is prescribed, that amount of dosage today?

6 A. Yes, I took the dosage as prescribed on the bottle of
7 medication.

8 Q. Alright. And what is that?

9 A. I am not sure what that is off the top of my head.

10 Q. Okay. Do you have any side-effects from that
11 particular medication?

12 A. Can you repeat the question?

13 Q. Yes. Does that medication, antidepressant medication
14 that we've been talking about, result in side-effects
15 after taking it?

16 A. No.

17 Q. So it's not going to interfere in any way with your
18 ability to understand and respond to questions,
19 correct?

20 A. I don't think it will.

21 Q. Why do you hesitate?

22 A. Well, because I don't know if it's -- I don't know if
23 it would or not, but I don't think that it will.

24 Q. Okay, fair enough. So you've taken it for two months?

25 A. Yes.

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1 Q. And you haven't noticed any side-effects from it in
2 the past two months that interfere with your cognitive
3 abilities and ability to engage in communications and
4 understand discourse with people?

5 A. That is correct.

6 Q. Okay. Or your ability to think and respond to
7 information?

8 A. Well, I don't know about all that. The medication
9 does sometimes make me a little hazy.

10 Q. Do you feel hazy right now?

11 A. No, I do not.

12 Q. Alright. What other medications, if any, are you
13 currently taking or took in advance of today's
14 deposition?

15 MR. ROSSMAN: In advance in what time
16 period, like years or days?

17 BY MS. HARDY:

18 Q. This morning.

19 A. Just that, caffeine if you count that as a drug.

20 Q. Okay. So let's go back to my question about prior
21 sworn testimony because I wasn't clear that you
22 understood the question.

23 So you've never been under oath before; is
24 that your testimony?

25 A. That is correct.

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1 Q. Okay. Have you provided witness statements that were
2 sworn?

3 A. No.

4 Q. So I take it you've never testified in any kind of
5 hearing under oath?

6 A. That is correct.

7 Q. Alright. Have you ever been a party in litigation
8 outside of this case, either a plaintiff or a
9 defendant?

10 A. Can you repeat that question one more time?

11 Q. Sure. You're a plaintiff in a case entitled Eid
12 versus Wayne State University, et al. Have you ever
13 been a plaintiff before in any other litigation?

14 A. I have been in Small Claims Court once before.

15 Q. Okay. And what was the title of that action?

16 A. I do not remember the title of the action. It was a
17 -- I do not remember the title of the action.

18 Q. Were you the moving party, the plaintiff?

19 A. Yes.

20 Q. You were suing somebody?

21 A. Yes.

22 Q. Who were you suing?

23 A. It was a tow truck company.

24 Q. What's its name?

25 A. I do not remember.

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1 Q. How long ago was that?

2 A. I believe that was around 2015. However --

3 Q. Where was the action pending?

4 A. In the 36th District Court.

5 Q. What was the disposition of the action?

6 A. Can you clarify that question?

7 Q. How was it resolved?

8 A. I was awarded judgment for an improper tow.

9 Q. Was there a jury verdict, or was it a bench trial or a
10 bench ruling; did the judge rule, or did the jury make
11 a decision?

12 A. The judge ruled.

13 Q. What was the judge's name?

14 A. I do not remember.

15 Q. Have you been a plaintiff in any other action other
16 than the tow truck company action from 36th District
17 Court and this current lawsuit?

18 A. No, I do not believe so.

19 Q. Have you been a defendant in any action?

20 A. No.

21 Q. Alright. So then in your entire life, there's been
22 two legal actions that you've been a party to, the
23 current action and the 36th District Court action
24 against the tow truck company?

25 A. Yes, I believe that to be correct to the best of my

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1 recollection.

2 Q. Do you need more time to reflect before answering?

3 A. No.

4 Q. What's your current home address?

5 A. 1247 Selden Street.

6 Q. How long have you lived at that address?

7 A. I have lived at that address since, it was either 2016

8 or 2017 when I moved in.

9 Q. Do you live there alone?

10 A. No. I have roommates.

11 Q. Alright. And so have you lived there continuously

12 since 2016 or '17?

13 A. Yes, I have.

14 Q. And where did you live immediately prior to that?

15 A. Prior to that I lived in Wayne State University

16 housing.

17 Q. Is that a rental apartment at Selden Street?

18 A. Yes, it is.

19 Q. Who is the landlord?

20 A. Woodbridge Estates.

21 Q. How many roommates do you have?

22 A. The number of roommates I have fluctuates.

23 Q. Who was your roommate when you first moved in; which

24 individuals were roommates when you first moved in?

25 A. When I first moved in?

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1 Q. Yes.

2 A. When I first moved in, I had two roommates. They were
3 colleagues of mine that I knew from college.

4 Q. What are their names?

5 A. One was named Scott Anteau.

6 Q. Spell his last name, please.

7 A. A-N-T-E-A-U.

8 Q. The other?

9 A. The other was -- you know, I cannot remember his name
10 at this moment because that third roommate had
11 switched around.

12 Q. Does Scott still live with you?

13 A. No.

14 Q. Does the other original roommate still live with you?

15 A. No.

16 Q. Do you know where Scott is today?

17 A. Scott is a resident physician. I do not know where he
18 is living.

19 Q. In the Metropolitan area of Detroit?

20 A. I am not sure.

21 Q. And you can't recall whether it was 2016 or '17 when
22 you moved in to the Selden address?

23 A. No, I cannot.

24 Q. What time of year was it, what season?

25 A. It was the fall.

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1 Q. Was it at the beginning of starting a particular
2 program at Wayne State?

3 A. It was after I graduated undergraduate and before I
4 started my Master's program.

5 Q. What year did you start your Master's program?

6 A. 2016.

7 Q. Alright. So if it's before you started your Master's
8 program in 2016, you moved in before 2016?

9 A. Yes.

10 Q. Okay. Do you have any other addresses where you
11 reside from time to time?

12 A. No.

13 Q. What's your date of birth?

14 A. August 11th, 1992.

15 Q. Your place of birth?

16 A. Could you clarify what you mean by place?

17 Q. Where were you born?

18 A. Are you saying like the hospital, a city?

19 Q. City, state?

20 A. In Metropolitan Detroit area.

21 Q. Do you have parents who are both alive?

22 A. Yes.

23 Q. And what is your father's name?

24 A. Edward.

25 Q. Last name is Eid?

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1 A. That is correct.

2 Q. Where does he reside?

3 A. He resides in Orchard Lake, Michigan.

4 Q. And your mother, is she still alive?

5 A. She is.

6 Q. Her name?

7 A. Evon, E-V-O-N.

8 Q. Eid?

9 A. Uh-huh.

10 Q. Does she reside in Orchard Lake, Michigan, as well?

11 A. She does.

12 Q. Are they both still married?

13 A. They are.

14 Q. Have they been married throughout your life?

15 A. Yes.

16 Q. Do you have siblings?

17 A. I do.

18 Q. Names, please?

19 A. So I have a stepbrother, his name is Chris Eid.

20 Q. Whose child is he?

21 A. He is my mother's child.

22 Q. Okay. From another marriage?

23 A. Yes.

24 Q. How old is he?

25 A. He is in his forties.

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1 Q. Okay. What other siblings do you have?

2 A. Simone Eid.

3 Q. How old is she?

4 A. He's a male. He is 27.

5 Q. Is that the child of Edward and Evon?

6 A. Yes.

7 Q. Any other siblings?

8 A. Yes, Jonathan Eid.

9 Q. How old is Jonathan?

10 A. He is 25.

11 Q. Is he the son of Edward and Evon?

12 A. Yes.

13 Q. Alright. Any others?

14 A. Yes, one more, Marcella Eid.

15 Q. Marcella?

16 A. Yeah.

17 Q. Alright. And how old is she?

18 A. She is twenty-two.

19 Q. And is she the daughter of Edward and Evon?

20 A. Yes.

21 Q. Do any of your siblings live with Edward and Evon?

22 A. Marcella does.

23 Q. Are you financially independent of your family?

24 A. Can you clarify that?

25 Q. Do you support yourself?

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1 A. Yes.

2 Q. Okay. Do they provide any financial support for you?

3 A. Yes.

4 Q. What type of financial support do they provide?

5 A. They help me out with bills if I need help.

6 Q. Anything else?

7 A. No, that's about it.

8 Q. So it's just ad hoc support when needed?

9 A. Yes.

10 Q. And who does it come from, your mother or father or
11 both?

12 A. It comes from both.

13 Q. Are you estranged from your mother?

14 A. Can you repeat the question?

15 Q. Do you know what the word "estranged" means?

16 MR. ROSSMAN: Object to form.

17 BY MS. HARDY:

18 Q. Do you have a relationship with your mother where you
19 see her, communicate with her, get along with her?

20 A. Currently I do.

21 Q. And when did that develop?

22 MR. ROSSMAN: Object to the form; vague.

23 BY MS. HARDY:

24 Q. Let me just provide some background. You have
25 represented in submissions to the School of Medicine

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1 that you were estranged from your mother?

2 A. Yes.

3 Q. You disowned her, she disowned you, you had no contact
4 with her, and apparently something has changed since
5 then. When did it change?

6 A. It has changed within the last six months.

7 Q. And what has it changed to; how would you describe the
8 nature of your relationship currently?

9 A. The nature?

10 Q. Yes. I mean, you know, how you're getting along with
11 one another?

12 A. It's a relationship that we're working on.

13 Q. Okay. Does she go to therapy with you?

14 A. No.

15 Q. Do you discuss your historical difficulties getting
16 along with your mother in therapy?

17 A. Sometimes, yes.

18 Q. Do you discuss in therapy the fact that you felt
19 abused by her as a child?

20 A. I have not yet discussed that in therapy.

21 Q. We'll go back to that later, but let's switch for a
22 moment to education. I understand your history at
23 Wayne State and at Wayne State Medical School, so, we
24 don't need to cover that, but I'm interested in
25 whether or not since leaving Wayne State Medical

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1 School in 2019 you have applied for any medical
2 program?

3 A. Can you restate that one more time?

4 Q. Have you applied for medical school since being
5 dismissed from Wayne State University Medical School?

6 A. I have been unable to do that.

7 Q. Have you made application and been told that you can't
8 proceed with the application because of certain
9 information you either provided or failed to provide?

10 A. You can't apply to a medical school without
11 transcripts from a university which Wayne State
12 University is currently holding.

13 MR. ROSSMAN: I'm just going to instruct,
14 just answer the question, okay?

15 THE WITNESS: Okay.

16 MR. ROSSMAN: If it's a yes or no, answer
17 it yes or no. If she wants to know that information,
18 she'll ask it.

19 THE WITNESS: Okay.

20 BY MS. HARDY:

21 Q. Let's clean that up for a moment. So you've got some
22 debt that you owe to Wayne State, correct, and they
23 are holding back transcripts until you pay off the
24 debt, correct?

25 A. I do not know.

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1 Q. You have no idea whether or not you have a debt with
2 Wayne State that is interfering with the release of
3 transcripts; no one has told you that?

4 A. I do not know.

5 Q. No one has told you that?

6 A. Can you clarify that?

7 Q. Nobody has indicated to you that you need to pay off X
8 debt before transcripts will be released?

9 A. No one told me that.

10 Q. Alright. So let's go back to my earlier question
11 about whether or not you have applied or attempted to
12 apply for a medical school program after being
13 dismissed from Wayne State University School of
14 Medicine.

15 Have you been in communication with any
16 medical schools about applying for their programs
17 since your dismissal from Wayne State?

18 A. Yes.

19 Q. Which schools?

20 A. University of Michigan, Michigan State University,
21 both their MD and DO medical programs, Oakland
22 University, Central Michigan University, and
23 University of Toledo.

24 Q. Have you submitted any kind of paperwork to any of
25 those institutions in connection with your interest in

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1 being admitted into their medical school?

2 A. What do you mean by paperwork?

3 Q. Have you like written a letter, have you filled out an
4 application, have you sent an email, have you sent a
5 text; have you done anything, have you generated
6 anything in writing where you've been communicating
7 through those writings with the various medical
8 schools you just listed about the prospect of you
9 applying and hopefully being admitted into their
10 program?

11 MR. ROSSMAN: Object to the form; compound.

12 You can answer the question if you
13 understand it.

14 BY MS. HARDY:

15 Q. I can take it one at a time if you want to do it that
16 way.

17 MR. ROSSMAN: That's not a question. Don't
18 try and make it like my objections are making this
19 longer than it has to be so the witness feels
20 compelled to jump in and answer confusing questions.

21 MS. HARDY: He said he --

22 MR. ROSSMAN: If you want to break it down,
23 break it down. I made an objection. I don't need
24 sarcastic statements to my client.

25 MS. HARDY: I provided clarification after

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1 he expressed --

2 MR. ROSSMAN: Can you read that question
3 back, please.

4 (The requested portion of the record was
5 read by the reporter at 10:06 a.m. as
6 follows:
7 "Question: Have you like written a letter,
8 have you filled out an application, have
9 you sent an email, have you sent a text;
10 have you done anything, have you generated
11 anything in writing where you've been
12 communicating through those writings with
13 the various medical schools you just listed
14 about the prospect of you applying and
15 hopefully being admitted into their
16 program?")

17 MR. ROSSMAN: I objected to that question.
18 He can either answer the question if he understand it
19 or you can rephrase it.

20 BY MS. HARDY:

21 Q. Do you understand? I gave you a whole list of
22 examples of what I meant by the word "paperwork".
23 Have you done any of the above?

24 MR. ROSSMAN: Same objection.

25 THE WITNESS: Yes.

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1 BY MS. HARDY:

2 Q. Okay. What have you done?

3 A. As far as paperwork?

4 Q. Yes, we're on written documentation.

5 A. Written documentation, there is written logs from
6 admission advisors at some of those schools, not all
7 of them, of my prospects of being admitted to those
8 universities.

9 Q. How do you know they have logs?

10 A. Can you repeat that?

11 Q. You indicated that there is written logs from
12 admission advisors?

13 MR. ROSSMAN: Do you understand the
14 question? You were asked if you submitted paperwork
15 to the universities, and the answer is yes or no, and
16 then she can follow up on that. So did you send any
17 paperwork to the universities to try and get admitted?
18 She doesn't want to know whether they have logs in
19 their personal files. She can get those with a
20 subpoena. You don't know what's in there. Have you
21 sent paperwork to those universities to get in?

22 THE WITNESS: I have had written
23 discussions.

24 BY MS. HARDY:

25 Q. Written discussions?

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1 A. Yes.

2 Q. So let's go back to my question. Answer my precise
3 question. I'll have some follow-up ones.

4 Have you put anything in writing that you
5 have sent to any of those universities about your
6 interest in applying, have you sent them an email, for
7 instance, a text, have you sent them a letter, have
8 you filled out any paperwork that they have online;
9 have you done any of those things?

10 A. I'm sorry, I'm really not understanding the question.

11 I wish I was but I'm not. Can you clarify a little
12 bit more?

13 Q. Very straightforward. I just need to know if you have
14 put anything in writing that you have given to those
15 schools in connection with your interest in getting
16 admitted into those schools?

17 A. I don't know what you mean by "given".

18 Q. Well, like you write an email and you send it to
19 somebody, you send it like, for instance, to an
20 admissions office. You write a letter and you send it
21 to an admissions office or you go online and you see
22 some questionnaires, and you fill those out and you
23 send them, anything along those lines? Those are just
24 examples, but have you put anything in writing that's
25 indicated that --

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1 A. Yes.

2 Q. Okay. What?

3 A. To some of those schools I have attended admission
4 webinars with the admissions advisors from the
5 schools.

6 Q. And what have you put in writing that either concerns
7 your qualifications or your interest in those medical
8 schools?

9 A. I have asked the admissions advisors what my chances
10 of being admitted to their schools are with a
11 dismissal from a medical school on my transcript.

12 Q. Who did you ask that question?

13 A. It was to the admissions advisors from the
14 universities that were on the webinars.

15 Q. And you did this over a webinar, so, through a virtual
16 form?

17 A. Yes, it was, yes, virtual.

18 Q. Okay. Have you put anything in writing about yourself
19 that you've given to any of those schools?

20 A. Well, the questions that I asked were in writing.

21 Q. Okay. Which schools did you give written information
22 to?

23 A. I believe they were Wayne State, Oakland, U of M, and
24 also various --

25 Q. Did you mean Wayne State or Michigan State?

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1 A. No. Wayne State was on the webinar as well. There
2 has also been -- can we go back a second?

3 Q. Sure.

4 A. In addition to those schools, I've also had
5 communications with Caribbean schools.

6 Q. Which ones?

7 A. Various Caribbean medical schools.

8 Q. Just informational type of communications or have you
9 actually made an application?

10 A. I have not made an application, but I have asked
11 specific questions about my chances of being admitted
12 with a dismissal on my transcript from a United States
13 medical school.

14 Q. Alright. And is it accurate that in all of your
15 communications, you have revealed that you were
16 dismissed from Wayne State University's Medical
17 School?

18 A. No, that's not accurate.

19 Q. Okay. Which of the various universities have you
20 disclosed that fact?

21 A. I don't think I've disclosed that fact that I was
22 specifically dismissed from Wayne State University to
23 any of them.

24 Q. Alright. So you're asking it as a hypothetical?

25 A. It's not a hypothetical.

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1 Q. When you're posing that question to one or more of the
2 universities that you've listed, do they know that
3 they're communicating with Anthony Eid, or are you
4 just somebody name unknown asking a question about
5 would you admit somebody who's been dismissed from
6 another medical school?

7 A. I'm confused because you changed your question there.
8 I don't know if --

9 MR. ROSSMAN: Just say you don't
10 understand.

11 THE WITNESS: I don't understand.

12 BY MS. HARDY:

13 Q. Alright. When you're communicating with these schools
14 through these webinars, do you identify yourself by
15 name, or do they think it's just some interested
16 person who's asking questions but they don't know who
17 it is?

18 A. I'm not sure what they think.

19 Q. Have you given any of these schools your name in
20 connection with any of the written communications that
21 you've had with them?

22 A. Yes.

23 Q. Okay. You also had verbal communications with them?

24 A. Yes.

25 Q. Alright. We'll go back to this later.

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1 When did you first consult legal counsel
2 about the issues that led to your dismissal from Wayne
3 State University?

4 MR. ROSSMAN: I'm just going to object to
5 that and instruct the witness not to answer. The
6 timing of the engagement of legal counsel does form
7 part of the establishment of the attorney-client
8 relationship and is something that is confidential and
9 not reasonably calculated to lead to the discovery of
10 admissible evidence.

11 MS. HARDY: I completely disagree with that
12 based upon both the law of attorney-client privilege
13 as well as the case law that is controlling in this
14 particular action. Let me just pose a few more
15 questions, and if that's your instruction, I'll move
16 on. We'll take it up with the Court later.

17 MR. ROSSMAN: Alright.

18 BY MS. HARDY:

19 Q. Did you consult legal counsel about your potential
20 dismissal from Wayne State University Medical School
21 before you received the final word from the provost of
22 the university that you indeed were going to be
23 dismissed?

24 MR. ROSSMAN: I make the same objection,
25 and you're going a little deeper because you're asking

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1 about the subject matter about what he consulted legal
2 counsel which is most definitely protected if the
3 timing of the engagement isn't. What he consults
4 counsel about, whether it be this situation or another
5 situation, is definitely covered by the
6 attorney-client privilege.

7 MS. HARDY: Again, I disagree but I'll move
8 on. One more question on this topic.

9 BY MS. HARDY:

10 Q. During the course of the proceedings at Wayne State
11 University that were dealing with whether or not you
12 would be dismissed, did you seek counsel, legal
13 counsel that is?

14 A. No.

15 Q. So you did not seek legal counsel concerning the
16 issues that led to your dismissal from Wayne State
17 University Medical School until after the final
18 decision had been made by the university; is that
19 correct?

20 A. That is correct, yes.

21 Q. Have you ever been in treatment for alcohol or
22 substance abuse?

23 A. No.

24 Q. Have you ever been in treatment for the illegal use of
25 prescription drugs?

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1 A. No.

2 Q. Has anyone ever suggested to you that you had a
3 substance abuse problem for which you should seek
4 treatment?

5 A. No.

6 Q. Has anyone ever suggested to you that you were
7 misusing prescription drugs?

8 A. No.

9 MS. HARDY: Alright. For the matter of the
10 record before I move onto another line of questioning,
11 I want to note that paragraph 22 of plaintiff's
12 Complaint identifies Roe as the pseudonym for the
13 former WSU student who made a complaint about the
14 plaintiff.

15 MR. ROSSMAN: Is that what paragraph 22
16 says, Liz?

17 BY MS. HARDY:

18 Q. I'm going to be referring to her as Roe, and I want to
19 be clear who I am referring to; is that understood,
20 Mr. Eid?

21 A. Yes, I understand.

22 Q. Let's talk about your smart phone since 2016. You
23 identify two in your interrogatory responses, an
24 iPhone 6 that you had from November, 2014 through
25 November, 2018, correct?

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1 A. That is correct.

2 Q. And that was an iPhone 6 Plus, correct?

3 A. Yes.

4 Q. An Apple phone, correct?

5 A. Uh-huh.

6 Q. Alright. And what was your user name on that phone?

7 A. What do you mean by user name?

8 Q. Well, you understand the Apple system, correct?

9 A. Yes.

10 Q. You're a long-term Apple user, correct?

11 A. Yes.

12 Q. And you have to have a user name and a password on the

13 Apple system, correct?

14 A. I don't know what system you're talking about. Could

15 you be more specific about what you're talking about

16 with user name?

17 Q. Well --

18 MR. ROSSMAN: Like the name that shows up

19 on a text or something?

20 BY MS. HARDY:

21 Q. No. A user name is your Apple ID, also known as an

22 Apple ID?

23 A. Yes, I had an Apple ID.

24 Q. So what was the Apple ID, and then what was your

25 password for your iPhone 6?

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1 A. The Apple ID was my Gmail e-mail address.

2 Q. Give that to me, please.

3 A. It is anthantheid@gmail.com.

4 Q. And what was your password?

5 A. I've had a lot of passwords over the years, so --

6 MR. ROSSMAN: Just indicate if you know.

7 BY MS. HARDY:

8 Q. What was your password for your iPhone 6 Apple phone?

9 A. I do not know.

10 Q. What is your Apple ID for your iPhone XS Max?

11 A. It is the same thing.

12 Q. The Gmail account?

13 A. Yes, anthantheid@gmail.com.

14 Q. And what is your current password?

15 MR. ROSSMAN: I'm going to object. You're
16 asking the current password of his current telephone
17 so it can be logged into?

18 MS. HARDY: Correct. It was November, '18,
19 when he acquired the phone according to his
20 interrogatory answers.

21 MR. ROSSMAN: Why do you want his password?

22 MS. HARDY: Because we may need to have his
23 phone imaged.

24 MR. ROSSMAN: Is this deposition under
25 seal?

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1 MS. HARDY: We can certainly make this
2 portion of the deposition under seal.

3 MR. ROSSMAN: Are we going to move to put
4 under seal the whole deposition?

5 MS. HARDY: That won't comport with the
6 local rules.

7 MR. ROSSMAN: Will your people's be under
8 seal?

9 MS. HARDY: No.

10 MR. ROSSMAN: What I'd like to do is have
11 the opportunity when the deposition is issued to
12 identify so we can confirm the portions of information
13 that is under seal because it does go beyond a
14 password. You're going to be talking about medical
15 records and issues.

16 MS. HARDY: There's going to be a lot of
17 confidential information.

18 MR. ROSSMAN: So I'm just going to
19 designate for now the entire deposition under seal so
20 that I don't have to interrupt, and then if there's
21 portions of it that shouldn't be under seal after,
22 I'll indicate my acquiescence to that, and if we have
23 some motion practice, we have some motion practice.

24 MS. HARDY: That's fine.

25 BY MS. HARDY:

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1 Q. So your password for your current iPhone, the XS Max?

2 A. Are you talking about phone password or the Apple ID
3 password?

4 Q. The Apple ID password. You need an Apple ID and a
5 password, right?

6 A. Yes. Thank you for clarifying.

7 MR. ROSSMAN: I'm actually going to object.

8 I'm not going to let him give you the password to his

9 current electronic devices for the reason that it

10 could literally be accessed later on this afternoon.

11 I just can't let him give that out. If we're going to

12 have -- if you get an order that you can have his

13 phone forensically inspected and there's a reason why

14 someone would need to access it, of course we'll

15 provide whatever password information, but I'm not

16 going to let him put on the record information that

17 would allow someone to just log into his currently

18 used electronic devices. I've never heard of that,

19 and I can't fathom why that freedom shouldn't be

20 given.

21 MS. HARDY: Are you suggesting anyone

22 connected with my clients at this table would do that?

23 MR. ROSSMAN: No, I'm not but are you

24 suggesting that we should freely give this out? I

25 don't see why. I've had situations -- in fact, I

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1 wouldn't even want the liability on my law firm of
2 another person's electronic device information. I
3 mean, there's no reason that we should give out
4 information that would allow that to be accessed, and
5 I don't even know why you'd want it right now. If
6 somebody is going to forensically access any of his
7 electronic devices --

8 MS. HARDY: We don't --

9 MR. ROSSMAN: Let me finish. I'll stop. I
10 won't finish my thought. You cut me off. I won't
11 finish. I'm not giving it. You can move the Court if
12 you want.

13 MS. HARDY: That's fine.

14 MR. ROSSMAN: Just so we're clear, if
15 there's an order or a discovery request which we don't
16 object to that says you can get into his Apple account
17 and the Court orders it, I'll give the information,
18 but it would have to be under some very strict
19 parameters like a third party accessing it, duplicate
20 copies made. I'm not going to have him give out
21 passwords to his current electronic devices.

22 MS. HARDY: I understood that. The only
23 reason why I was trying to suggest that you didn't
24 need to go any further is because your point was
25 clear, and we're not going to resolve it sitting here.

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1 I'm just trying to save time.

2 MR. ROSSMAN: I don't want to be quoted as
3 somehow interfering in something you should have got.
4 I need it to be clear on the record that what you're
5 asking for is the information that would allow his
6 electronic devices to be accessed from a computer
7 right now, and I'm not going to let that be put into
8 the record, but under certain parameters if it's shown
9 to be relevant and you need access to that and we
10 either agree or the Court orders it, well then, of
11 course, we couldn't stand in your way, but right now
12 there's no purpose to having that. User ID names and
13 things like that so you can see what electronic device
14 is communicating, maybe you have some documents,
15 that's fine, but passwords, that's a little bit too
16 far. That's like getting somebody's Social Security
17 Number and you don't even have a judgment against them
18 yet.

19 BY MS. HARDY:

20 Q. Let's go back to your iPhone XS Max. You acquired
21 that in November, 2018, correct?

22 A. Yes, I bought it shortly after it was released.

23 Q. And that was, according to your interrogatory answers,
24 November, 2018, correct?

25 A. I believe so, yes.

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1 Q. And you have Verizon coverage on that particular
2 phone, correct?

3 A. Yes.

4 Q. You had Verizon coverage on your iPhone S Plus,
5 correct?

6 A. The 6S Plus, yes.

7 Q. 6S Plus, yes, and you had the same user name for both
8 accounts, correct?

9 A. Yes.

10 Q. And the phone number for both phones is 248.310.8610,
11 correct?

12 A. That's correct.

13 Q. So that has been your smart phone phone number since
14 August, 2016, correct?

15 A. Yes.

16 Q. When you purchased your new phone in November, 2018,
17 did you transfer the data from your iPhone 6 Plus to
18 your new phone?

19 A. Yes.

20 Q. So everything that was on this 6 Plus is currently on
21 the XS Max, right?

22 A. That is correct.

23 Q. You use your phone for what various purposes,
24 telephone calls obviously, text messages, correct?

25 A. Yes.

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1 Q. Emails, correct?

2 A. Yes.

3 Q. Okay. And what was your practice regarding the
4 retention of text messages?

5 A. Retention of text messages?

6 Q. Yes.

7 A. What do you mean by that, practice?

8 Q. Did you keep your text messages, did you delete them
9 on a daily basis; what practice did you have regarding
10 retention/deletion of text messages?

11 A. Are you asking about my current practice or from one
12 iPhone to the new one?

13 Q. Let's start back in August, 2016. Up until November,
14 2018, when you transferred to a new phone, what was
15 your practice with your iPhone 6 Plus, and if it
16 changed at some point, tell me when it changed and how
17 it changed?

18 A. I delete my, you know, old text messages maybe every
19 couple months.

20 Q. So you do it randomly as opposed to on a schedule
21 programmed by your phone, is that correct, you
22 manually go in and delete as opposed to have your
23 phone set for an automatic deletion?

24 MR. ROSSMAN: Do you understand the
25 question?

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1 THE WITNESS: No, I really don't.

2 MR. ROSSMAN: Just simply ask that it be
3 rephrased. You don't have to look at her for ten
4 seconds. Just say you don't understand the question,
5 okay?

6 THE WITNESS: Can you clarify?

7 BY MS. HARDY:

8 Q. Would you manually delete your text messages when you
9 decided I don't need that anymore, or did you have
10 your phone settings set in such a way where there
11 would be an automatic deletion of everything every 30
12 days or 90 days or whatever? Those are two options,
13 right?

14 A. I'm not aware of that second option.

15 Q. Okay. So then it's fair to assume you didn't utilize
16 the second option since you're not aware of it,
17 correct?

18 A. Yes.

19 Q. So then you were manually deleting text messages that
20 you decided you didn't need anymore on your phone or
21 didn't have an interest in having anymore on your
22 phone, right?

23 A. That's correct.

24 Q. Alright. Let's talk for a moment about your personal
25 computers. You identify in your Answers to

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1 Interrogatories that you had a Microsoft Surface Book
2 PC purchased in late 2015 and currently in use; is
3 that accurate?

4 A. Yes.

5 Q. What did you use that device for?

6 A. That was my personal computer. I used it for what you
7 would use a personal computer for.

8 Q. Did you email from that personal computer?

9 A. Yes.

10 Q. For work as well as social reasons?

11 A. Yes.

12 Q. Alright. Did you have texting capacity from that
13 computer?

14 A. No.

15 Q. Alright. You use that computer to access your various
16 social media accounts?

17 A. Yes.

18 Q. And to exchange messages with others on social media?

19 A. Yes.

20 Q. Alright. What has your practice been since late 2015
21 in terms of deletion of any data from that computer,
22 if you had any particular practice?

23 A. I do not. I don't really -- I do not.

24 Q. Okay. So you haven't deleted things from that
25 computer since 2015; is that accurate?

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1 MR. ROSSMAN: Object to the form of the
2 question.

3 THE WITNESS: I mean, I'm sure I deleted
4 things.

5 BY MS. HARDY:

6 Q. Do you recall anything that you have deleted from your
7 personal computer since 2015?

8 A. I do not recall that, no.

9 Q. Okay. You don't have any memory of something that you
10 decided I'm going to get rid of this or that?

11 A. Not specifically.

12 Q. Alright. Thank you. And the serial number for that
13 computer is 006073563857, correct?

14 A. I do not know.

15 MR. ROSSMAN: I would have been impressed
16 if you did.

17 MS. HARDY: That's the information you
18 provided in the Answers to Interrogatories.

19 MR. ROSSMAN: If you want to show it to
20 him, you can but come on, asking him a serial number
21 by memory.

22 BY MS. HARDY:

23 Q. Let me ask you this: Did you review the interrogatory
24 questions at some point before the answers were
25 served?

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1 A. Yes.

2 Q. Alright. And did you check all of the answers for
3 accuracy?

4 A. Yes.

5 Q. Okay. So we can assume that if the serial number was
6 provided in response to interrogatory number 10, you
7 checked it for accuracy before it was served on the
8 defendants, correct?

9 A. You know, I'm not clear on that.

10 MR. ROSSMAN: I'll just make an objection
11 that it's a confusing question.

12 BY MS. HARDY:

13 Q. You checked the substantive responses that were
14 provided under your name for accuracy, correct?

15 A. That is correct, yes.

16 Q. And that would include the serial number that you
17 provided in response to interrogatory number 10,
18 correct?

19 A. Yes.

20 Q. Thank you. Could you please identify for the record
21 all email addresses that you have used since August,
22 2016?

23 A. Yes. There's the Gmail address,
24 anthantheid@gmail.com. There is a Yahoo address with
25 the same name, anthantheid@yahoo.com. There is my

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1 Wayne State email that is aeid@med.wayne.edu, and
2 recently there is my work email which is
3 eida@michigan.gov.

4 Q. Do you work for the State of Michigan?

5 A. Yes.

6 Q. In an employee position?

7 A. Yes.

8 Q. Are you a W-2 employee?

9 A. Yes.

10 Q. When did you start that employment?

11 A. I believe that was in August of 2020.

12 Q. What is your position?

13 A. I am a commissioner on the Michigan Independent
14 Citizens Redistricting Commission.

15 Q. And that's a paid position?

16 A. It is.

17 Q. For everyone who's on the commission?

18 A. That is correct.

19 Q. And how many people are on the commission?

20 A. Thirteen.

21 Q. Is it a full-time job?

22 A. Yes.

23 Q. Forty hours a week?

24 A. The hours vary.

25 Q. Who do you report to in that position; who is your

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1 supervisor?

2 A. We're an independent commission.

3 Q. Does anyone oversee your work?

4 A. We're an independent commission, so no, no one
5 oversees our work. The public does, I suppose.

6 Q. So if you were not showing up for work or not doing
7 your job or needing to take a medical leave, there is
8 nobody that you report to?

9 MR. ROSSMAN: Objection; compound.

10 MS. HARDY: I'm just giving examples.

11 MR. ROSSMAN: I'm just making a form
12 objection.

13 MS. HARDY: And that's fine.

14 MR. ROSSMAN: But every time I make a form
15 objection and you make a comment, it makes it more
16 difficult for the witness to remember what the
17 question is. You asked about three or four things in
18 one question. I don't want that asked at trial that
19 way, so I make a form objection, that's all.

20 BY MS. HARDY:

21 Q. So there is no oversight with respect to any aspect of
22 the work you do or your responsibilities as an
23 employee?

24 A. The commission oversees itself.

25 Q. How were you hired or selected, whichever term is

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1 appropriate, for the commission?

2 A. I was selected by a random drawing.

3 Q. Was there any discretion allowed, or was it strictly

4 random in terms of selection choices?

5 A. Can you clarify what you mean by discretion?

6 Q. Yes. Did someone, like for instance -- let me back

7 up.

8 Did you file an application?

9 A. Yes.

10 Q. Okay. Who did you file the application with?

11 A. It was an application that was filed, I believe,

12 through the Secretary of State's office.

13 Q. Alright. And was there any, to your knowledge, review

14 process as to who was qualified to be put in the pool

15 for random selection?

16 A. Yes.

17 Q. Okay. And who was in charge of deciding which

18 applications warranted going into the pool for random

19 selection, if you know?

20 A. I am not sure.

21 Q. Alright. When did you apply?

22 A. I believe I first applied in the spring of 2020.

23 Q. When were you selected or appointed?

24 A. In August of 2020.

25 Q. And what's the proper term, selected or appointed?

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1 A. I am not sure.

2 Q. How are you compensated?

3 A. How am I compensated?

4 Q. Yes.

5 A. What do you mean?

6 Q. Does the State of Michigan pay you?

7 A. Yes.

8 Q. And what's your annual compensation?

9 A. The annual compensation is around 50,000 a year.

10 Q. Do you get benefits?

11 A. No.

12 Q. And do you have to submit any information to anyone to
13 verify what hours you put in, what you've done and
14 accomplished that entitles you to 50,000 a year?

15 A. Yes, we log our hours.

16 Q. Anything beyond that, anything of substance that you
17 have to convey so that they know what exactly you've
18 been doing with your time?

19 A. Can you repeat that?

20 Q. Do you have to provide them any information about what
21 projects you've worked on or projects you've
22 completed, anything like that so that they know what
23 you've been accomplishing for the \$50,000?

24 A. Provide who?

25 Q. Anyone.

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1 A. No.

2 Q. Alright. So how do you know what you're supposed to
3 be doing in terms of work; who shares that information
4 with you?

5 MR. ROSSMAN: You want him to testify how
6 he knows or who shares it with him? Because, again,
7 it's two questions in one.

8 MS. HARDY: It would be the same thing.

9 MR. ROSSMAN: I object; compound.

10 BY MS. HARDY:

11 Q. How do you know what it is you're expected to do?

12 A. It's written in the Michigan Constitution.

13 Q. So your only guide as to what you should be doing with
14 your time day-to-day is the Michigan Constitution?

15 Is that yes?

16 A. I'm thinking but I want to answer your question
17 accurately.

18 Q. Okay.

19 A. Yes, I would say so.

20 Q. No other information has been distributed to you about
21 what you're supposed to be doing as the commissioner
22 or as one of the commissioners?

23 A. Information has certainly been distributed to us.

24 Q. By who?

25 A. By various entities that we have asked to present

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1 information to us.

2 Q. You mean outside entities?

3 A. What do you mean by outside entities?

4 Q. Someone other than the State of Michigan?

5 A. Yes, content experts.

6 Q. So tell me what you do in your job; what do you do

7 that warrants paying you \$50,000 a year?

8 A. Our job is to re-draw the district maps for Michigan's

9 US Congressional, Michigan's State House, and

10 Michigan's State Senate districts.

11 Q. I understand that but what do you do --

12 MR. ROSSMAN: Objection; argumentative.

13 BY MS. HARDY:

14 Q. -- in connection with that?

15 MR. ROSSMAN: I'm going to object that it's

16 a confusing question.

17 BY MS. HARDY:

18 Q. What do you do day-to-day in terms of your work?

19 Explain what you do. How do you perform your job;

20 what are the tasks you perform to carry out the

21 general --

22 MR. ROSSMAN: Same objection. You ask one

23 question, and he pauses before he answers, and you ask

24 another one, and you make it so I have to object. If

25 you can ask one single question, he can give you an

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1 answer.

2 MS. HARDY: He can't understand the one
3 single question.

4 MR. ROSSMAN: Ask him a clear question.

5 BY MS. HARDY:

6 Q. What do you do in your job day-to-day for your \$50,000
7 a year?

8 A. We are in the process of redrawing the maps for
9 Michigan's US Congressional, State House and State
10 Senate districts.

11 Q. That's a general sweeping statement. What's your --

12 MR. ROSSMAN: Argumentative. I'm going to
13 ask counsel that you limit your verbal statements on
14 the record to questions. It's all you're allowed to
15 under the Court Rules. I don't need your commentary.
16 You can argue this witness's testimony at trial, do
17 whatever you want, but here you're going to show him
18 respect as if a judge was supervising this and ask
19 questions and not make condescending statements.
20 Proceed.

21 MS. HARDY: We're getting close to calling
22 the Magistrate. Your level of interference is beyond
23 the pale.

24 MR. ROSSMAN: Your manner of questioning
25 doesn't comport with how questions should be answered.

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1 I'm making soft objections allowing you to move on.

2 MS. HARDY: We'll let Magistrate Grand make
3 that --

4 MR. ROSSMAN: Are you going to argue that
5 you're allowed to make statements and commentary?

6 MS. HARDY: I would be very happy to let
7 Magistrate Grand review the transcript and make the
8 decision.

9 MR. ROSSMAN: You can file a motion.

10 MS. HARDY: I will do that. If I cannot
11 proceed without all of this interference, then it's
12 becoming so disruptive that we're going to need
13 guidance from the Magistrate as to what the ground
14 rules are.

15 MR. ROSSMAN: If you proceed with form
16 objections and compound objections when you're asking
17 double questions while the witness is thinking about
18 his answers as interference, then I think we're not
19 seeing eye to eye.

20 Can you read the last question back and the
21 first comment that counsel made after it, please.

22 MS. HARDY: We're not here to have
23 questions read back at Mr. Rossman's request. I will
24 ask a new question, and we'll try to proceed here as
25 simply as we can.

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1 MR. ROSSMAN: Okay. And don't try to scare
2 me from objecting by threatening me. My objections
3 are proper. You're allowed to ask this witness
4 questions, and when he gives you answers, I'm not even
5 getting into the eye rolling and the facial
6 expressions because I can't prove it one way or the
7 other, but let's show the witness a little respect,
8 okay? That's all I'm asking.

9 BY MS. HARDY:

10 Q. I want to know what job tasks you perform day-to-day
11 in the interest of carrying out this broader function
12 which is to re-draw the district lines; what do you
13 do?

14 A. Okay. I review plans on proposed districts that
15 people from the public have proposed. We recently
16 went on a state-wide public hearing tour to 16 cities
17 around our state. We review information from our
18 lawyers about topics such as the Voting Rights Act or
19 the Constitutional criteria that we're supposed to
20 follow in drawing the maps. We do a lot of
21 administrative work to get this whole thing going.

22 That's what the day-to-day looks like.

23 Q. Do you work remotely, or do you have an on-site
24 office?

25 A. Due to the pandemic, we were working remotely. It

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1 wasn't until recently that state-wide pandemic
2 restrictions were limited, but currently we are
3 meeting in person.

4 Q. When you filed an application for a commissioner
5 position, what representation did you make about Wayne
6 State Medical School and your status as a medical
7 student?

8 A. I did not make any statement on that topic, the
9 application. I did not make any statement on that
10 topic.

11 Q. So you didn't provide any information in the
12 application about whether you'd ever been a medical
13 student or still were a medical student?

14 A. There were no questions on the application about those
15 type of qualifications.

16 Q. Alright. Were there any questions on the application
17 about education?

18 A. No, not that I can remember.

19 Q. Have you made any representations to the State of
20 Michigan about your status with Wayne State University
21 School of Medicine?

22 A. Can you repeat the question?

23 MS. HARDY: Can you read it back.

24 (The requested portion of the record was
25 read by the reporter at 10:45 a.m. as

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1 follows:

2 "Question: Have you made any
3 representations to the State of Michigan
4 about your status with Wayne State
5 University School of Medicine?")

6 THE WITNESS: No, I do not believe I have.

7 MS. HARDY: Alright. Let the record

8 reflect I'm going to mark as Deposition Exhibit

9 Number 1 the Plaintiff's Responses to Defendants'

10 First Set of Interrogatories, and I will provide a

11 copy to the witness and to counsel.

12 MARKED FOR IDENTIFICATION:

13 EXHIBIT 1

14 Plaintiff's Responses to

15 Defendants' First Set of

16 Interrogatories

17 10:46 a.m.

18 MS. HARDY: And I am marking as Exhibit

19 Number 2 the responses filed by plaintiff to

20 defendants' first set of production documents.

21 MARKED FOR IDENTIFICATION:

22 EXHIBIT 2

23 Plaintiff's Responses to

24 Defendants' First Set of

25 Document Production Requests

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1 10:46 a.m.

2 BY MS. HARDY:

3 Q. Let's look first at Exhibit 1, please. Do you
4 recognize this document? Take a moment and flip
5 through it if you need to.

6 I need you to take a moment and look at the
7 questions and the answers required by the Court Rules
8 to sign these, and they have not been signed by you as
9 is required. So I need you to verify the accuracy of
10 the responses for the record while you're under oath.

11 MR. ROSSMAN: Just for the record, it was
12 an oversight that we didn't get you the signature page
13 on this, and if you'd like, he'll sign them now so you
14 don't have to go through them.

15 MS. HARDY: Perfect. I will get you the
16 signature page, verification page.

17 (Recess taken at 10:48 a.m.)

18 (Back on the record at 10:51 a.m.)

19 MS. HARDY: Back on the record. I've asked
20 my assistant to prepare a verification page for the
21 Answers to Interrogatories in light of counsel's offer
22 to provide a signature so we don't have to spend our
23 time going through those, all those answers.

24 BY MS. HARDY:

25 Q. You did, I just need to verify for the record, you

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1 provided the information to counsel with respect to
2 those interrogatory questions, correct?

3 A. Yes, that is correct.

4 Q. Alright. And you reviewed the final document before
5 it was submitted to defendants, correct?

6 A. I believe so.

7 Q. Okay. To verify its accuracy, correct, since it's
8 your information, not theirs?

9 A. Yes.

10 Q. Alright. So we'll get you the verification page. I
11 have the same questions concerning Exhibit Number 2
12 which is Plaintiff's Response to Defendants' First Set
13 of Document Requests. You reviewed that document?

14 A. Yes.

15 Q. Okay. And what did you do to conduct a search for
16 responsive documents?

17 A. Documents pertaining to Exhibit 2, correct, is what
18 you're talking about now or just generally?

19 Q. Well, Exhibit 2 asks for an array of different
20 documents that relate to the allegations you've made
21 in this lawsuit, and I want to know what you did after
22 reviewing those requests to search for responsive
23 documents?

24 A. I searched for the documents.

25 Q. How did you go about that search?

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1 A. I searched -- I guess it would depend on which
2 question in particular you're asking about, but
3 generally speaking, I'd go through old emails, go
4 through old documents either written by me or by
5 people at the School of Medicine.

6 Q. Anything else?

7 A. That's about it.

8 Q. What devices did you search for old emails?

9 A. I used my PC, my laptop.

10 Q. Did you use search terms, or did you just scroll
11 through old emails?

12 A. Both.

13 Q. What search terms did you use?

14 A. I'd put in the name of the person I was speaking to
15 for that document. For example, if it was a document
16 relating to communications with Dr. Jackson, I'd
17 search for Dr. Jackson.

18 Q. Did you put in the name, the actual legal name for the
19 person we'll be referring to in this litigation as
20 Roe; did you put her name in?

21 A. I did not have -- can you clarify the question?

22 Q. Alright. I'm making my best effort not to put her
23 name on the record even though nothing prohibits us
24 from doing that. Out of respect to her, we are trying
25 to adhere to that ground rule, but you know her name,

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1 correct?

2 A. Uh-huh.

3 Q. Yes?

4 A. Yes.

5 Q. Did you put her name into your search terms or her
6 email account into your search terms?

7 A. I do not remember if I did or not.

8 Q. Alright. You had her email address, correct?

9 A. I do not -- can you clarify that?

10 Q. You knew what Roe's email address was in 2016, 2017,
11 2018, and 2019, correct; you knew what her Gmail
12 address was?

13 A. I don't know if I knew what it was or not.

14 Q. Is it your testimony you never emailed her?

15 MR. ROSSMAN: Object to the form; misstates
16 his testimony.

17 BY MS. HARDY:

18 Q. Did you ever email Roe?

19 A. I do not believe I ever emailed Roe.

20 Q. Are you sure about that?

21 A. Am I sure about what?

22 Q. That you never emailed her?

23 A. To the best of my knowledge, I never emailed Roe.

24 Q. And you never knew what her email was?

25 A. I don't know if I knew about what her email was or

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1 not.

2 Q. Did you ever receive an email from Roe?

3 A. I do not believe I did.

4 Q. Other than the use of search terms, how did you
5 attempt to locate on your PC responsive documents?

6 A. Most of the documents asked for located emails between
7 myself and the administration. So I went back to that
8 time and looked for those emails.

9 Q. I'm sorry? I didn't understand your response. Most
10 of the documents asked for located emails between
11 myself and the administration, can you explain what
12 that means?

13 A. Most of the documents that were asked for were
14 documents pertaining to communications I had with
15 administration at the School of Medicine.

16 Q. When you say most of the documents that you had, you
17 mean most of the documents on your PC?

18 A. I have a lot of documents on my PC.

19 Q. But how did you cull from all the documents on your PC
20 those that pertain to the events in this lawsuit?

21 A. I searched for them.

22 Q. Alright, with search terms?

23 A. With both search terms and going back and lists of
24 documents and going back to that time period and
25 seeing what I could find.

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1 Q. Alright. So you searched by date, and then you
2 searched by search terms?

3 A. I don't know if I would characterize it as searching
4 by date. I looked for the documents created during
5 that time period.

6 Q. Alright. So when you refer to documents, are you
7 distinguishing documents from emails?

8 A. Am I distinguishing between them?

9 Q. Yes.

10 A. No. I'm using them as a collective term.

11 Q. Alright. Were there documents in addition to emails,
12 word documents, PDFs?

13 A. Yes.

14 Q. Okay. And did you have those organized on your
15 computer in any fashion?

16 A. I had them put in a documents folder with a whole
17 bunch of other documents.

18 Q. What was the name of that folder, and what was stored
19 in it, what range of documents?

20 A. The name of that folder was documents, and it was the
21 folder that all documents get automatically saved to
22 on a computer.

23 Q. Documents that could be about Wayne State or could be
24 about the redistricting commission; I mean, it could
25 be any and every document you stored on your computer?

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1 MR. ROSSMAN: Object to the form.

2 THE WITNESS: Could be.

3 BY MS. HARDY:

4 Q. Alright. So when you go within the document file, how
5 did you go about locating documents that are
6 responsive to the document request?

7 A. I went back and looked for those documents.

8 Q. Did you look at each and every document in the
9 document file to make sure that you had selected all
10 documents that were responsive to the request?

11 A. I did a thorough look at all of the documents to make
12 sure that my answers to the document request were
13 sufficient.

14 Q. Explain how within the document file you did a
15 thorough search for documents that are responsive here
16 as opposed to other documents that were not
17 responsive.

18 A. I went through the documents in the folder to make
19 sure anything that I had was included in this request.

20 Q. Okay. So is it fair to assume then that you're saying
21 you went through each and every document, opened it up
22 to see whether or not it pertained or didn't pertain?

23 MR. ROSSMAN: Object to form.

24 THE WITNESS: I didn't open every single
25 document.

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1 BY MS. HARDY:

2 Q. How would you know whether a document was responsive
3 if you didn't open it and take a look at it?

4 A. Because of the name of the document.

5 Q. Alright. So you relied upon your naming conventions
6 to give you sufficient information about the content
7 to know whether or not the document was responsive?

8 A. The name, the file type, the date created of the
9 document, the date last modified of the document.

10 Q. How many emails do you have on your PC?

11 A. I'm not sure if I have any emails locally stored on my
12 PC.

13 Q. Do you still have access to all emails that you've
14 exchanged with another e-mailer since the time you got
15 that PC?

16 A. Can you clarify that question?

17 Q. Are all your old emails still accessible on the PC?

18 A. I'm not sure they're accessible on the PC. They're
19 accessible on the server that they were sent on.

20 Q. That they were backed up on?

21 A. If it was a Wayne State email, for example, on Wayne
22 State's email client.

23 Q. What about your Gmail; are those backed up?

24 A. Those would be on the Gmail client.

25 Q. Okay.

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1 A. But I don't think they're locally stored on my PC.

2 Q. That was my question. Do you know if they're locally
3 stored on your PC?

4 A. Well, which emails are you talking about? There are
5 certainly some emails locally stored on my PC.

6 Q. Okay. What has been your practice in terms of what
7 emails you retain on your PC?

8 A. I don't usually retain emails on my PC.

9 Q. What is your practice in terms of retention? Do they
10 last a day, do they last months, years; how long do
11 you keep them before you delete them?

12 A. I don't ever recall deleting any emails from my PC.

13 Q. Then they should still be there, correct?

14 A. I would suppose so.

15 Q. Alright. And so your Yahoo emails, Gmail emails,
16 Wayne State emails, and michigan.gov emails would also
17 be on your PC, correct?

18 A. No. Like I said, they would be located on the servers
19 where those emails were sent.

20 Q. Well, they may be also located there, but if you don't
21 bother to delete them from your PC, they're accessible
22 through your PC?

23 MR. ROSSMAN: I think that's misstating how
24 email works. There's a server out there, and you send
25 it from your email. If you don't download it, you're

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1 not going to find it on your PC. I think your
2 question is does he download emails from servers and
3 save them on his PC, and if he does so, how often and
4 whether it relates to this case because I think you're
5 confusing the witness here not by any fault of your
6 own. I think we just have a fundamental
7 misunderstanding on how the computer works.

8 BY MS. HARDY:

9 Q. Alright. Have you ever deleted any of your Gmail
10 emails?

11 MR. ROSSMAN: Ever?

12 THE WITNESS: Your question is have I ever
13 deleted a Gmail email?

14 BY MS. HARDY:

15 Q. Correct.

16 A. Yes, I'm sure I've deleted Gmail emails.

17 Q. Have you ever gone back and deleted or put a setting
18 on your computer that all emails that predate a
19 certain date will automatically be deleted?

20 A. I do not believe I have that kind of setting set.

21 Q. So then you selectively delete particular emails, but
22 you don't have any system for an automatic deletion?

23 MR. ROSSMAN: Object to the form of the
24 question and it's asked and answered. He already told
25 you what his practices are in this regard.

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1 MS. HARDY: Please respond to the question.

2 Can you read it back.

3 (The requested portion of the record was

4 read by the reporter at 11:05 a.m. as

5 follows:

6 "Question: So then you selectively delete

7 particular emails, but you don't have any

8 system for an automatic deletion?")

9 MR. ROSSMAN: Object to the form of the

10 question; compound and confusing.

11 BY MS. HARDY:

12 Q. Is that correct?

13 A. Yes, I believe that is correct.

14 Q. And that pertains to Yahoo and Gmail and Wayne State,

15 correct?

16 A. Yes.

17 Q. Thank you. So let's talk about your phone and the

18 search you did for responsive data on your phone

19 concerning defendants' document request. What did you

20 do to ensure that you had produced all data on your

21 phone that was responsive to the document request?

22 A. I searched my phone to see if there was anything in it

23 related to the document request.

24 Q. And how did you do that? Explain the process.

25 A. I scrolled through my text messages, for example, to

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1 see if there was anything in there. I scrolled
2 through my photos to see if there was anything saved
3 in there. You key word search on your phone as well,
4 so, I did that as well.

5 Q. What key words did you use?

6 A. I would search for the name of the person the document
7 request was referring to.

8 Q. Did you use as a key word search the name, legal name
9 of Roe as a first or last name or both?

10 A. I am not sure if I did or not but I may have.

11 Q. When did you do this search, how long ago?

12 A. It was after you all gave us the request, so, shortly
13 after that.

14 Q. In the past six months, correct?

15 A. Yes, within the past six months.

16 Q. And you can't recall whether you used Roe's name or
17 Roe's email in attempt to pull up communications that
18 you had electronically with her?

19 A. Well, I already told you I don't know if I had Roe's
20 email or not.

21 Q. Well, you certainly texted with her, correct?

22 A. Yes, that is true.

23 Q. Okay. But you can't recall whether you put her name
24 into a text message search so that you pulled up text
25 messages with her?

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1 A. I recall searching for those text messages.

2 Q. Just by scrolling through and seeing what was on your
3 phone?

4 A. Yes.

5 Q. Okay. Photos, how did you go about locating
6 responsive photos?

7 A. I went and looked at my photos from that time period
8 and saw if there was anything relevant.

9 Q. What time period did you look through?

10 A. The time period where the facts of this case were
11 taking place, so, 2016 to 2019.

12 Q. You are on Facebook, correct?

13 A. Can you clarify what you mean by that?

14 Q. You are a Facebook user, correct?

15 A. I have a Facebook account.

16 Q. Okay. And how long have you had that account?

17 A. I have had that account for many years.

18 Q. Prior to 2016?

19 A. Yes, prior to 2016.

20 Q. And what settings do you have on that account in terms
21 of privacy?

22 A. It is a -- I would have to look to be honest.

23 Q. You have no recall of what settings --

24 MR. ROSSMAN: Asked and answered.

25 BY MS. HARDY:

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1 Q. -- you've selected?

2 MR. ROSSMAN: Asked and answered.

3 THE WITNESS: It is a -- it is a -- I don't

4 know the specific --

5 MR. ROSSMAN: You either know or you don't

6 know. You don't have to give a bunch of extra

7 information. You know or you don't know.

8 BY MS. HARDY:

9 Q. Did you select the settings at the time you opened the

10 account, or have you made adjustments and changes

11 since the time that the account first came into

12 existence through today's date?

13 A. I do not know.

14 Q. Alright. You had accepted Roe as a friend on your

15 Facebook account, correct?

16 A. I do not know.

17 Q. Do you have an Instagram account?

18 A. I do.

19 Q. Alright. When did you first acquire that account?

20 A. I am not sure. I've had that account for many years

21 as well.

22 Q. Prior to 2016?

23 A. Yes, that account was active prior to 2016.

24 Q. Do you know what your privacy settings are on that

25 account?

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1 A. Can you clarify what you mean by privacy settings?

2 Q. You don't know what the different settings are for the
3 level of privacy on an Instagram or Facebook account?

4 MR. ROSSMAN: Object to the form;
5 argumentative.

6 BY MS. HARDY:

7 Q. Whether anybody can access it or only certain people
8 can access it?

9 MR. ROSSMAN: Compound.

10 BY MS. HARDY:

11 Q. And have you looked at the setting options?

12 MR. ROSSMAN: Objection also because it's
13 become confusing as you keep adding layers to the
14 questions.

15 BY MS. HARDY:

16 Q. New question. Have you ever looked at the setting
17 options available to an Instagram user?

18 A. I'm sure I looked at those options at some point.

19 Q. And you have no idea what those options are sitting
20 here today?

21 A. The account -- I'm just confused on what you're
22 asking.

23 Q. Alright. So I want to know whether or not you have
24 made any attempt to familiarize yourself with the
25 setting options for an Instagram or Facebook account

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1 and make any selections within those settings that
2 would prohibit outsiders from getting access to
3 information on your account?

4 A. I believe the accounts are set up so that you have to
5 be whatever, like a friend, to access that
6 information.

7 Q. Alright, both Facebook and Instagram?

8 A. Instagram. I'm not sure about Facebook.

9 Q. Was Roe at any point in time a friend that you had
10 accepted on your Instagram account?

11 A. I am not sure.

12 Q. Do you have a Snapchat account?

13 A. I do.

14 Q. Alright. When did you acquire that account?

15 A. I've had it for many years.

16 Q. Prior to 2016?

17 A. Yes.

18 Q. Alright. And did you communicate with Roe on
19 Snapchat?

20 A. I do not believe I did.

21 Q. Alright. Did you communicate with Roe on Instagram?

22 A. I do not believe I did.

23 Q. Did you communicate with Roe on Facebook?

24 A. Yes, I did.

25 Q. Were you a friend of Roe's on Facebook?

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1 A. I am not sure if I was a friend or not.

2 Q. Did you ever look at her Facebook?

3 A. I do not recall specifically looking at her Facebook.

4 Q. You have no recollection of ever in passing looking at
5 what she posted?

6 MR. ROSSMAN: Asked and answered.

7 BY MS. HARDY:

8 Q. Did you ever get any messages from her about Facebook
9 postings and then look at that posting?

10 A. I don't think I ever specifically looked at her
11 account.

12 Q. Did you look at anything she posted on Facebook?

13 A. Did I look at anything she posted on Facebook?

14 Q. Yes.

15 A. Stuff on Facebook come up.

16 MR. ROSSMAN: You either know or you don't
17 know.

18 THE WITNESS: I don't know.

19 MR. ROSSMAN: Just listen closely to the
20 question and answer it directly.

21 THE WITNESS: Gotcha.

22 BY MS. HARDY:

23 Q. Did you ever look at anything she posted on Instagram?

24 A. I do not know.

25 Q. You have no recollection you're saying?

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1 A. Exactly.

2 Q. Okay. And Snapchat, you have no recollection of
3 seeing anything she communicated through the Snapchat
4 medium; is that correct?

5 A. Yes, I do not believe I had any contact with her on
6 Snapchat, period.

7 Q. Alright. Did you ever see anything that was
8 communicated by Roe on Twitter?

9 A. Yes.

10 Q. Alright. How was that?

11 A. What was that?

12 Q. How did you come in contact with that or happen to see
13 it?

14 A. It came up on my Twitter feed.

15 Q. Alright. So you're a Twitter user?

16 A. Yes, I am a Twitter user.

17 Q. Okay. And do you know how her Twitter message came up
18 on your feed?

19 A. I assume she made a tweet and it came up on my feed of
20 tweets.

21 Q. Alright. Did you ever put anything out on Twitter
22 that was designed to come up on her feed?

23 A. No.

24 Q. What did you review from Roe in terms of her Twitter
25 messages; what was the content?

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1 A. What do you mean by review?

2 Q. You said you saw, something came up on your Twitter
3 feed from her, correct?

4 A. Yes.

5 Q. Okay. What was that?

6 A. I mean, a lot of things come up on Twitter, so, I do
7 not recall.

8 Q. I'm referring specifically to her. Do you recall
9 anything that you saw that was put on Twitter by Roe?

10 A. Yes.

11 Q. What?

12 A. She posted messages that seemed, that seemed -- give
13 me a second, please.

14 MR. ROSSMAN: Do you need the question read
15 back to start over with your answer?

16 MS. HARDY: Counsel, that's prompting the
17 witness, and that's not appropriate.

18 MR. ROSSMAN: I don't think it's --

19 MS. HARDY: Yes, it is.

20 MR. ROSSMAN: I think it's unclear whether
21 there's a question pending. You're talking to counsel
22 and passing notes and not listening. Now it's
23 confusing what the question even was.

24 MS. HARDY: He hasn't expressed any
25 confusion. He can speak for himself. You are

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1 prompting the witness to ask for a new question.

2 Go back and read the question back, please.

3 MR. ROSSMAN: I'm here to make sure that
4 the record is clean, not muddled up. If your
5 questions were allowed to stand, it would be very,
6 very unclear.

7 MS. HARDY: I've had such a terrible time
8 in my career.

9 MR. ROSSMAN: I'm not making any comments
10 on your career. I mean, you're an esteemed lawyer.
11 I'm talking about this record right now, and you seem
12 to take issue every time I object, and it becomes a
13 big argument. Just let me make my objections and
14 we'll move on like I'll do with you when you defend
15 depositions. I'm not going to fight with you.

16 MS. HARDY: You know, if we went back and
17 looked at how much time you've been on this record
18 versus even your client, I think you might be winning
19 the day.

20 MR. ROSSMAN: I think we'd also see it's
21 precipitated by your manner of questioning.

22 MS. HARDY: Let's not argue. Could you
23 read the question back.

24 (The requested portion of the record was
25 read by the reporter at 11:17 a.m. as

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1 follows:

2 "Question: Do you recall anything that you
3 saw that was put on Twitter by Roe?

4 "Answer: Yes.

5 "Question: What?

6 "Answer: She posted messages that seemed,
7 that seemed -- give me a second, please.")

8 BY MS. HARDY:

9 Q. I'm giving you a second to finish your answer.

10 A. I remember messages that she posted where she seemed
11 down.

12 Q. What timeframe are you referring to?

13 A. I believe that was either in 2016 or 2017.

14 Q. And what about the message led you to conclude that
15 she was down?

16 A. The context of the messages.

17 Q. What was the substance that gave you that impression?

18 A. I don't remember the exact substance but -- I don't
19 remember the exact substance.

20 Q. Do you remember generally what the substance was that
21 led to that conclusion?

22 A. The substance was her being in a down state of mind.

23 Q. Do you follow or have you ever followed Roe on
24 Twitter?

25 A. I believe I did follow her at one point.

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1 Q. At what point?

2 A. It would have been either 2016 or 2017.

3 Q. Okay. Have you ever followed Roe on Instagram?

4 A. I do not believe I ever did but I may have.

5 Q. Have you ever deleted any social media posts of your
6 own?

7 A. Have I deleted a social media post? I'm sure I've
8 deleted a social media post at some point in my life.

9 Q. Have you ever deleted any social media posts that
10 relate to Roe or that were related to a communication
11 with Roe?

12 A. No.

13 Can you repeat that last question?

14 MS. HARDY: Can you read it back, please.

15 (The requested portion of the record was
16 read by the reporter at 11:19 a.m.
17 as follows:

18 "Question: Have you ever deleted any
19 social media posts that relate to Roe or
20 that were related to a communication with
21 Roe?"

22 BY MS. HARDY:

23 Q. Do you need to clarify your answer?

24 A. Could I clarify that?

25 Q. Certainly.

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1 A. At some point I deleted both the text messages and
2 Facebook message communication I had with Roe.

3 Q. When did you do that?

4 A. I did that in October of, I think it was October of
5 2017, but I'd have to -- that might be wrong but I
6 think it was October of 2017.

7 Q. Let me ask a follow-up question that may refresh your
8 memory.

9 The complaint was filed by Roe in October,
10 2018. Did you delete your Facebook and text messages
11 a full year prior to that complaint being filed?

12 A. I'm not sure the exact date the complaint was filed,
13 but I deleted them before I knew of any complaint.

14 Q. What precipitated you deleting the messages when you
15 did?

16 A. I received a phone call from a Colorado number who I
17 presumed to be Roe or someone affiliated with Roe that
18 contained a racial slur that threatened to get me
19 deported. So at that point I deleted the messages and
20 ceased all communication.

21 Q. And what is the date of that phone call?

22 A. It was around that same timeframe.

23 Q. Do you have any record of the date of that phone call?

24 A. I believe we submitted a record of that to you
25 already.

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1 Q. And your testimony is that that was before Roe filed a
2 complaint but right around that time?

3 A. I do not know when Roe filed the complaint, but it was
4 before I knew any complaint had been filed.

5 Q. Have you ever made any video recordings with Roe?

6 A. No.

7 Q. Do you have any audio recordings of communications
8 you've had with Roe?

9 A. No.

10 Q. Have you downloaded any electronic communications or
11 social media communications with Roe onto any exterior
12 device, a disk, a flash drive, something of that
13 nature?

14 A. I may have submitted a copy of those tweets I was
15 referring to in the documents I submitted to the
16 School of Medicine.

17 Q. And do you have a recall whether you did, or are you
18 speculating that you submitted them to the School of
19 Medicine?

20 A. I'd have to look but I may have.

21 Q. So --

22 A. I certainly referenced them.

23 Q. Alright. So the tweets were sometime in '16 or '17
24 according to your testimony?

25 A. Yes.

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1 Q. Alright. And did you do something to preserve those
2 tweets?

3 A. At that time, no.

4 Q. Where would those tweets be located a couple years
5 later?

6 A. They would still be on the Twitter account in
7 question.

8 Q. Okay. And the Twitter account is your account,
9 correct?

10 A. No.

11 Q. You're referring to tweets on her Twitter account?

12 A. Yes.

13 Q. Well, how would you get access to her Twitter account
14 a couple years after you saw the tweet?

15 A. What do you mean by that?

16 Q. So if she tweeted you in 2016, that's one of the years
17 you gave as a possibility, and you are providing
18 information to the School of Medicine in connection
19 with the proceedings related to your potential
20 dismissal in 2018 and 2019, how did you get access to
21 at that point in time the tweets from 2016?

22 A. I would have had to have gone back and scrolled
23 through Twitter to see them.

24 Q. Alright. So how would you scroll through Twitter?

25 A. You scroll down until you see what you're looking for.

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1 Q. So Twitter messages that you received on your feed?

2 A. No, not Twitter messages directly sent to me. Twitter

3 messages just put out there into the Twitter --

4 Q. Twitter world, okay. So what vehicle would you use to

5 review and scroll through those messages?

6 A. I'd use my PC.

7 Q. And what browser would you use?

8 A. I don't recall the browser I used at that time.

9 Q. Alright. And did you access them through a website?

10 A. It would be twitter.com.

11 Q. Twitter.com, but to see her old tweets, you'd have to

12 go under her Twitter feed, correct?

13 A. I'm not sure if that's correct or not.

14 Q. You don't recall whether you went onto her Twitter

15 feed?

16 A. I do not recall, no.

17 Q. Did you preserve any posts that were made by Roe on

18 Facebook?

19 A. No, I do not recall any such posts.

20 Q. Did you delete posts made by Roe from your Facebook?

21 A. No.

22 Q. So you could go onto your Facebook today, and if she'd

23 ever had a Facebook message with you or Facebook post

24 that was sent to you, you would be able to access

25 that, correct?

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1 A. Are you asking about messages or posts?

2 Q. Both.

3 A. Well, those would require different answers.

4 Q. Okay. So let's take posts first.

5 A. Posts, no, I do not recall even seeing any posts from
6 her.

7 Q. You did receive messages from her?

8 A. Direct messages, yes.

9 Q. Okay. And did you delete any of those messages?

10 A. As I have said already, I deleted those messages in
11 October of, did we say 2018 I think, when I received
12 the phone call with the racial slur.

13 Q. Alright. Before you deleted them from Facebook, did
14 you preserve them either through screenshots or
15 printed a copy of them; did you do anything to
16 preserve the message?

17 A. No, I did not.

18 Q. Same question for Instagram. You received Instagram
19 messages from Roe, correct?

20 A. I think I already stated that I did not.

21 Q. And did you send any to her via Instagram?

22 A. I do not recall sending any messages to her via
23 Instagram.

24 Q. Did you see any posts that she placed on Instagram?

25 A. I don't know if I saw any posts or not.

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1 Q. Alright. Have you ever deleted any posts that you --
2 let's assume hypothetically or let's assume you
3 received a post. Did you ever delete any post from
4 Roe on Instagram?

5 A. So again, are you talking about posts or messages, and
6 are you talking about generally or specifically from
7 Roe?

8 Q. Let's take posts specific to Roe.

9 A. No, I do not believe I ever saw any post specifically
10 to Roe.

11 Q. And you don't believe you ever saw any messages
12 specific to Roe, correct?

13 A. On Instagram, that's correct.

14 Q. And let's take concerning Roe. Did you ever see any
15 posts concerning Roe on Instagram?

16 A. Wasn't that the prior question?

17 Q. No, specific to Roe was prior.

18 A. Now is?

19 Q. Somebody else could post something concerning her.

20 A. Concerning Roe?

21 Q. Yes.

22 A. No.

23 Q. You never saw any post concerning Roe that came from
24 somebody other than Roe?

25 MR. ROSSMAN: Objection; asked and

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1 answered.

2 MS. HARDY: I just want to get clarity.

3 MR. ROSSMAN: I think the problem is the
4 questions are lacking in foundation and are very
5 confusing.

6 THE WITNESS: I do not believe so, no.

7 BY MS. HARDY:

8 Q. Alright. And did you ever receive any messages via
9 Instagram about Roe?

10 A. No.

11 Q. Let's go to Snapchat. You said you never had any
12 Snapchat exchanges with Roe, correct?

13 A. Yes, I do not recall having any Snapchat conversations
14 with --

15 Q. Have you ever had any --

16 MR. ROSSMAN: Let him finish the answer.

17 You're moving kind of quick here.

18 BY MS. HARDY:

19 Q. Do you have something more to say?

20 A. Did you get the full answer?

21 Q. Yes. Did you ever have any Snapchat exchanges with
22 anyone that were about Roe?

23 A. No.

24 Q. At the time you deleted in October of 2018 all your
25 text messages from Roe, were all the messages that you

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1 had exchanged with her prior to that date still on
2 your phone?

3 A. I believe so, yes.

4 Q. Why did you delete them in October, 2018?

5 MR. ROSSMAN: Asked and answered.

6 You can answer it again.

7 BY MS. HARDY:

8 Q. You indicated that you had gotten a phone call that
9 you claimed used a racial slur from Colorado?

10 A. Uh-huh.

11 Q. That doesn't tell me why you deleted your text
12 messages.

13 MR. ROSSMAN: Objection to the form of the
14 question and argumentative.

15 THE WITNESS: I deleted the text messages
16 because I received that racial slur that threatened to
17 get me deported, and at that point, I wanted no more
18 communication with Roe. So I deleted the text
19 messages and blocked her.

20 BY MS. HARDY:

21 Q. Okay. Are you an American citizen?

22 A. Yes.

23 Q. Do you have a dual citizenship?

24 A. No.

25 Q. How did you think you were going to be deported?

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1 MR. ROSSMAN: Object to the form; misstates
2 his testimony --

3 MS. HARDY: Did you --

4 MR. ROSSMAN: Let me put my objection on
5 the record. We've got to have some rules here. I
6 object to the form and it misstates his testimony, and
7 I'm not going to explain why because I know you'll
8 accuse me of coaching but it does.

9 MS. HARDY: Okay, thank you.

10 BY MS. HARDY:

11 Q. Were you scared you'd be deported?

12 A. I wasn't scared I'd be deported but having something
13 like that said to you is scary.

14 Q. And what does deleting messages, prior messages with
15 her do to protect you from any bad acts that she or
16 someone else might have in mind; what's the connection
17 between the two?

18 A. As I said, I both deleted the messages and blocked her
19 because I didn't want anymore communication with her
20 at that point.

21 Q. Alright. And you blocked her as someone who could
22 send you text messages?

23 A. I blocked her from my phone and all social media
24 accounts at that point.

25 Q. And that would include Facebook, Instagram, Snapchat,

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1 and Twitter?

2 A. Any one of those, if she was connected to me on those,
3 it would include all of them, but I'm not sure
4 specifically all four of those if they were or not.

5 Q. So you don't recall what social media accounts you
6 blocked her from?

7 A. The one I recall for sure is Twitter. The other ones
8 I do not recall and obviously my cell phone.

9 Q. Is it accurate that you only met Roe one time in
10 person?

11 A. That is accurate.

12 Q. Alright. And that was back in August, 2016, correct?

13 A. I believe so, yes.

14 Q. And that was at the FestiFall event at Wayne State
15 University, correct?

16 A. Yes, that's correct.

17 Q. What is that event about?

18 A. That is like a student orientation event where all of
19 the student boards on campus set up tables and tents
20 to introduce the students of the campus about those
21 groups and student organizations and such.

22 Q. What was the reason you were in attendance at that
23 event?

24 A. I was at the time the President of the student
25 government, so, we had a tent and a table set up.

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1 Q. Alright. And who were you working with that day?

2 A. I was working with various other student centers.

3 Q. And how was it that you -- strike that.

4 How many people roughly were in attendance
5 at that event on that day?

6 A. At the whole event?

7 Q. Yes.

8 A. I'm not sure how many people.

9 Q. Well, hundreds, thousands?

10 A. Hundreds for sure.

11 Q. Okay. How is it that you came in contact on that day
12 with Roe?

13 A. Roe walked up to the tent that I was stationing.

14 Q. Okay. Tell me what transpired.

15 A. Can you repeat that question; do you want a synopsis
16 of the whole --

17 Q. Tell me generally. She walked up and how did you meet
18 her?

19 A. She walked up. I introduced myself. She introduced
20 herself. I let her know what the student senate was
21 and what we did, and if she needed any help from us,
22 she could reach out and we would try to help her.

23 Q. Her parents were with her at the time; is that
24 correct?

25 A. Can you clarify what you mean by "with her"?

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1 Q. Her parents were present and hearing your conversation
2 at the time?

3 A. No, that is not correct.

4 Q. Okay. Did you meet her parents that day?

5 A. Yes, I did.

6 Q. So they came to the event with her?

7 A. Yes.

8 Q. Alright. How long did you spend talking with her?

9 A. Maybe about 15 or so minutes.

10 Q. Okay. And did she introduce you then to her parents
11 after that?

12 A. After the conversation we had, she told me she wanted
13 me to meet her parents. So I walked over to them with
14 her, and they were about maybe 10 or 15 yards away.

15 Q. What did Roe have to say to you during the time you
16 spent chatting with her?

17 A. Roe said that she was nervous about starting college,
18 specifically about her course work because she felt
19 that she was not prepared.

20 Q. And this is prior to even starting classes, correct?

21 A. Yes.

22 Q. Did she say anything else that you recall?

23 A. No. That's about it. That's all I can recall.

24 Q. Do you have any notes, electronic or handwritten, that
25 memorialize what occurred between the two of you, what

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1 words were exchanged on that day?

2 A. I've written about this interaction in my

3 documentation to the university and the School of

4 Medicine.

5 Q. Okay. But other than what you wrote years after the

6 fact, do you have any notes that you created around

7 the time of your meeting with Roe back in August,

8 2016, that memorialize what she said and you said

9 during your exchange, or are you relying just on

10 memory alone?

11 A. Just to be clear, you're asking me if I memorialized

12 my interactions with this one student around the time

13 that I met her?

14 Q. Correct.

15 A. No, I did not.

16 Q. When did you first memorialize that interaction; was

17 it in 2018 when you were preparing a statement in

18 connection with the investigation that was occurring?

19 A. The first time I was asked about that interaction was

20 during my meeting with Ms. Nikolina Camaj, and then

21 shortly after I must have wrote about it somewhere.

22 Q. Okay. And so at that point in time, you're operating

23 on memory from a couple years ago?

24 A. That is correct.

25 Q. Alright. Since your one and only meeting where you're

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1 actually face-to-face with Roe, have you had any other
2 kind of communication with her outside of text
3 messages?

4 A. Outside of text message and Facebook message, I have
5 had absolutely zero communication with her.

6 Q. Okay. So the only communications you've had with her
7 are the -- strike that.

8 So you've never talked to her on the phone,
9 correct?

10 A. That is correct.

11 Q. Alright. So you've seen her once in person for
12 roughly 15 minutes back in August, 2016. You've never
13 talked to her on the phone. Since then, the only
14 communications are the texts and Facebook messages?

15 A. That's correct.

16 Q. And you don't have a record of any of your texts or
17 Facebook messages, correct?

18 A. I think we've went over that already.

19 Q. Just confirm that, please.

20 A. Yes.

21 Q. That is a correct statement?

22 A. It is.

23 MR. ROSSMAN: Objection; asked and
24 answered.

25 MS. HARDY: You jumped right on your

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1 client's answer.

2 MR. ROSSMAN: You asked the same question
3 three times in 30 seconds, so I wanted to get an
4 objection. You don't have to tell me I'm jumping on
5 my client's answer.

6 MS. HARDY: Well, you were.

7 MR. ROSSMAN: You've been jumping on him
8 all day.

9 MS. HARDY: I want to make sure it's a
10 correct statement, so, I will have to repeat it again,
11 and hopefully your lawyer will refrain from
12 interrupting.

13 MR. ROSSMAN: Whoa, whoa, whoa. Objections
14 aren't interruptions.

15 MS. HARDY: When you --

16 MR. ROSSMAN: They're allowed in the Court
17 Rules just for the record.

18 MS. HARDY: Okay.

19 MR. ROSSMAN: If you're going to make smug
20 statements, you're going to get responses. Let me
21 make my objections.

22 BY MS. HARDY:

23 Q. Can you please pause before you answer and let your
24 lawyer object, then proceed to answer so we can have a
25 clean record?

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1 MR. ROSSMAN: That's an improperly
2 argumentative statement. Wait until she frames a
3 proper question to answer it, okay?

4 BY MS. HARDY:

5 Q. In summary, your contact with Roe has consisted of one
6 15-minute roughly meeting with her in August, 2016,
7 and text and Facebook messages and no phone calls; is
8 that a correct statement?

9 A. Yes.

10 Q. And you do not have any record of any text or Facebook
11 messages other than what Roe provided to Wayne State
12 University School of Medicine during the course of the
13 proceedings that led to your dismissal; is that
14 correct?

15 A. I don't think she provided them to the School of
16 Medicine, I think she provided them to Ms. Camaj, but
17 other than that, that is a correct statement.

18 Q. Let's focus on the BIO 1510 exam benchmark questions.
19 Do you know what I'm talking about?

20 A. I believe you're referring to old practice test
21 material.

22 Q. You sent BIO 1510 exam benchmark questions to Roe,
23 correct?

24 A. Can you clarify what you mean by sent?

25 Q. You provided her with copies of such exam questions,

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1 correct?

2 A. I am not sure they were exam questions. They were
3 practice -- they were practice test questions that
4 students used to test themselves to prepare them for
5 exams.

6 Q. Alright. Well, we'll go back to that distinction that
7 you're drawing later.

8 How is it that you provided Roe with copies
9 of either exam questions or test practice questions as
10 you prefer to phrase it; how is it that you
11 communicated those to her or conveyed them to her?

12 MR. ROSSMAN: Object to the form;
13 foundation, misstates his testimony, compound.

14 THE WITNESS: Roe obtained those documents
15 from my iCloud account.

16 BY MS. HARDY:

17 Q. How did she have access to your iCloud account?

18 A. She had her computer with her on the day that we met
19 and logged into my iCloud account and downloaded them.

20 Q. During the 15 minutes when you met her for the first
21 time and only time in August, 2016, you provided her
22 access to your iCloud account?

23 MR. ROSSMAN: Object to foundation;
24 misstates his testimony.

25 BY MS. HARDY:

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1 Q. Is that correct?

2 A. Can you repeat that one more time?

3 Q. During the 15 minutes that you met this woman at the
4 FestiFall event for new incoming students, you
5 provided her with access to your iCloud account?

6 A. That is correct.

7 Q. Why did you do that?

8 A. Because I was the student body President, and my job
9 was to make sure that students performed well in their
10 classes.

11 Q. Why would you provide her with access to your iCloud
12 account as opposed to sending her materials that you
13 thought might be helpful to her through a safe means?

14 A. That is where the material was stored.

15 Q. So explain how she got access at the FestiFall event
16 to your iCloud account; what occurred?

17 A. Roe had her laptop with her. She went to icloud.com.
18 I gave her my email address, and I put in my password.
19 We went to the iCloud drive folder or she went to the
20 iCloud drive folder, and then I assumed she downloaded
21 the content of the folder to her desktop.

22 Q. Alright. Did you observe what she was doing while she
23 was on your iCloud account through her computer?

24 A. I did not observe it with my eyes. I was giving her
25 instruction verbally.

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1 Q. How many different people have you allowed in the
2 interest of ensuring that students do well in their
3 classes to have access to your iCloud account?

4 A. This is the only instance where another student
5 accessed my iCloud account.

6 Q. Has anyone other than Roe ever had access to your
7 iCloud account?

8 A. I do not believe so.

9 Q. And so why her?

10 A. Well, like I said, she was a student who seemed in
11 need, and she specifically said for this class that I
12 had taken years and years prior and I had the
13 material, so, I was trying to just help her out.

14 Q. What class was it for?

15 A. I believe it was for BIO 1510 which is the intro
16 level, well, the intermediate level bio course.

17 Q. So let me just make sure I understand. You just met
18 this woman at an event for all new students, and
19 you're there to meet with students who come through to
20 answer questions, interface with them, and you meet
21 her, and within 15 minutes, you allow her to access
22 your iCloud account on her computer with your user
23 name and password?

24 A. That is correct.

25 Q. And to download information?

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1 A. Correct.

2 Q. And she's the only student that you have ever done
3 that for or, in fact, only person you've ever allowed
4 access; is that correct?

5 MR. ROSSMAN: Asked and answered objection.

6 Answer it again.

7 BY MS. HARDY:

8 Q. Is that correct?

9 A. That is correct specifically relating to my iCloud
10 account.

11 Q. And what did she say to you that persuaded you that
12 you should take this exceptional action for this one
13 person?

14 MR. ROSSMAN: Objection; assumes facts not
15 in evidence.

16 BY MS. HARDY:

17 Q. Let's go back. Would you consider this an unusual
18 thing to do, to give someone access to your iCloud
19 account as opposed to taking the step of sending them
20 the information yourself in a way that's secure?

21 A. At the time I did not think it was an extraordinary
22 step.

23 Q. Why not?

24 A. Because I was not familiar with the safety concerns
25 that came with doing that.

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1 Q. But nevertheless, you never did it with anybody else,
2 just with Roe?

3 MR. ROSSMAN: Asked and answered objection.

4 Answer it again.

5 BY MS. HARDY:

6 Q. Correct?

7 A. That is correct.

8 Q. Irrespective of whether you knew all the potential
9 dangers of giving out your iCloud account to somebody
10 and allowing them to actually get on your account, why
11 didn't you just email her the information on iCloud
12 that you wanted her to have?

13 A. The files in question were far too large to send over
14 email.

15 Q. Well, there are other mechanisms you can use like
16 Dropbox, correct?

17 MR. ROSSMAN: Objection; argumentative,
18 assumes facts not in evidence.

19 BY MS. HARDY:

20 Q. That would be more secure than giving your iCloud
21 information out?

22 MR. ROSSMAN: Objection; calls for
23 speculation. The question is compound.

24 BY MS. HARDY:

25 Q. Correct?

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1 A. I'm not sure if that would be more secure or not.

2 Q. What was the size of the files that you believe she
3 downloaded or you're claiming she downloaded?

4 MR. ROSSMAN: Object to the form of the
5 question. It's argumentative. It assumes facts not
6 in evidence.

7 THE WITNESS: I'm not sure how big the file
8 sizes were, but I know they were too big to be sent
9 through email.

10 BY MS. HARDY:

11 Q. What did those files consist of?

12 A. Old textbooks and those practice questions that we
13 spoke about earlier.

14 Q. What old textbooks?

15 A. Old textbooks for the BIO 1510 class.

16 Q. Do you still have those old textbooks on your iCloud?

17 A. I am not sure if they're still on my iCloud or not.

18 Q. Do you still have the practice questions on your
19 iCloud account?

20 A. I'm not sure if they're there or not to this day.

21 Q. How many old textbooks did you have?

22 A. Are you asking generally how many old textbooks did I
23 have throughout my whole career?

24 Q. That you had kept on iCloud or stored on iCloud?

25 A. There were many textbooks stored on iCloud.

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1 Q. But related to the BIO 1510 class?

2 A. There were -- so now you're asking specifically about
3 the BIO 1510 class?

4 Q. Yes, I am.

5 A. I believe there were at least two textbooks for that
6 course that were stored on my iCloud.

7 Q. Have you since 2016 deleted any material from your
8 iCloud account?

9 A. I don't know if I deleted any material from my iCloud
10 account or not since 2016.

11 Q. After the August 2016 meeting with Roe, did you
12 initiate any contact with her through either text or
13 social media?

14 A. I do not believe I initiated any contact with her
15 until my accounts started to be breached.

16 Q. Did you provide any additional exams or textbooks to
17 her after that day in August, 2016, when you gave her
18 access to your iPhone account?

19 MR. ROSSMAN: Do you mean practice exams or
20 like real exams?

21 MS. HARDY: I'm not qualifying it one way
22 or the other.

23 MR. ROSSMAN: Objection; misstates the
24 testimony, assumes facts not in evidence, foundation,
25 vague, ambiguous, and confusing.

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1 You can answer the question if you
2 understand it.

3 THE WITNESS: No, I do not believe I did.

4 MS. HARDY: Let's take a break for a
5 moment.

6 MR. ROSSMAN: About how long?

7 MS. HARDY: Ten minutes. What would you
8 like to do for a lunch hour, if anything?

9 MR. ROSSMAN: I'd like to push through.

10 MS. HARDY: We'll take some kind of lunch
11 break but it doesn't have to be long. Let's come back
12 within 15 minutes.

13 (Recess taken at 11:52 a.m.)

14 (Back on the record at 12:12 p.m.)

15 BY MS. HARDY:

16 Q. What is your Twitter handle?

17 A. It is @antheid.

18 Q. What is your Twitter password?

19 MR. ROSSMAN: I'm going to object to his
20 Twitter -- his current Twitter password is what you
21 want?

22 MS. HARDY: Let me back up.

23 BY MS. HARDY:

24 Q. Has your Twitter password changed since 2016?

25 A. I'm sure it has.

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1 Q. Do you know what your Twitter password was in 2016?

2 A. Not off the top of my head.

3 Q. Do you know what any of your Twitter passwords have
4 been since 2016?

5 A. Yes.

6 Q. I'd like whatever Twitter passwords you do recall?

7 MR. ROSSMAN: Well, hold on a second. Can
8 you just explain to me why you want this? Because
9 it's the same concern I have as before.

10 MS. HARDY: So if it's the same concern,
11 we've already kind of aired our differences of
12 opinion. So I'll just preserve it and move on.

13 BY MS. HARDY:

14 Q. Same question with respect to Facebook. I need your
15 user name and password since 2016.

16 MR. ROSSMAN: Same objection on the
17 password.

18 MS. HARDY: Alright.

19 MR. ROSSMAN: Just the password, though.

20 If you want his user name --

21 BY MS. HARDY:

22 Q. What's your user name on Facebook since 2016?

23 A. I'm not sure if Facebook uses user names. My name on
24 my account is just my name, Anthony Eid. It might be
25 Anthony.Eid as a user name.

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July 21, 2021

1 Q. Alright. And Snapchat, your user name, your screen
2 name?

3 A. The same thing, Antheid.

4 Q. Okay. And has that been the same since 2016?

5 A. Yes.

6 Q. Alright. And your password?

7 A. I mean --

8 MR. ROSSMAN: Objection.

9 BY MS. HARDY:

10 Q. I need to ask to make sure it's part of the record.

11 Instagram, your user name or screen name

12 since 2016?

13 A. It's the same thing, Antheid.

14 Q. And your password?

15 MR. ROSSMAN: Same objection.

16 BY MS. HARDY:

17 Q. Alright. And iCloud, your user name since 2016?

18 A. I think I gave that to you already.

19 MR. ROSSMAN: It is asked and answered, but

20 you can give it again if she wants to ask it again.

21 What's your user name?

22 MS. HARDY: And the password, you objected

23 to password?

24 MR. ROSSMAN: Yes.

25 BY MS. HARDY:

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1 Q. When you deleted the text messages and Facebook
2 messages that you had exchanged with Roe in October,
3 2018, did you read them before you deleted them?

4 A. No.

5 Q. When had you last read them prior to deleting them?

6 A. I had last read them whenever the conversations
7 happened.

8 Q. So you had not gone back to look at any of them after
9 the fact?

10 A. That's correct.

11 Q. Alright. Did you do anything to preserve the content
12 of those messages, either Facebook or texts before
13 deleting them?

14 A. No, I did not.

15 Q. Alright. Do you recall the content of any of the
16 Facebook messages that you deleted that were with Roe
17 or concerning Roe?

18 A. I recall the content of the messages being in regards
19 to fixing the unauthorized access that was happening
20 on my accounts.

21 Q. Do you recall anything more specific than that?

22 A. I believe that is actually the only communication I
23 had pertaining to her.

24 Q. So you don't recall anything specific that she said or
25 you said on those messages; you just know the general

ANTHONY EID
July 21, 2021

1 topic was about fixing your accounts?

2 A. That is correct.

3 Q. Same question with respect to text messages. Do you
4 recall anything about the substance of the text
5 messages that you had exchanged with Roe?

6 A. The substance of the messages were in regards to
7 fixing the unauthorized access that was happening to
8 my accounts.

9 Q. And that was the only topic of the text messages?

10 A. I believe so.

11 Q. And you don't recall anything specific that she said
12 in the text messages?

13 A. I don't recall anything specific.

14 Q. And you don't have any way to refresh your
15 recollection as to what the substance was of the
16 Facebook messages that you deleted or the text
17 messages but for the fact that it was about fixing the
18 unauthorized account?

19 A. That's correct.

20 Q. Had you ever provided study materials to any other
21 student at Wayne State?

22 A. Yes.

23 Q. How did you provide those materials?

24 A. Usually especially after this event took place it
25 would be --

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July 21, 2021

1 Q. What event are you referring to, the FestiFall in
2 2016?

3 A. Yes, after FestiFall and after my account started
4 being breached, I took precautions. So if I ever
5 provided students study materials, it was through like
6 a Google drive link or through a flash drive.

7 Q. Alright. Well, prior to the alleged hacking of your
8 account, had you ever provided anyone other than Roe
9 study materials?

10 A. Yes.

11 Q. Alright. Do you recall who?

12 A. I do not recall who. I was a student for a very long
13 time.

14 Q. Can you give me an estimate of how many different
15 students you provided study materials to?

16 A. I do not know the answer to that question.

17 Q. You have no idea whether you're talking about a
18 handful or dozens or hundreds?

19 MR. ROSSMAN: Asked and answered. He said
20 he didn't know.

21 THE WITNESS: I do not know.

22 BY MS. HARDY:

23 Q. I'm asking if you can give me some idea of how many?

24 A. I'm really not sure.

25 Q. Alright. How did you convey those study materials to

ANTHONY EID
July 21, 2021

1 other students prior to the hacking event?

2 A. Usually it would be through a flash drive.

3 Q. Any other mechanisms you used?

4 A. At that time I do not believe so.

5 Q. When did you use a flash drive with Roe?

6 A. I did not have a flash drive with me.

7 Q. Why didn't you get her information and send her a

8 flash drive or have her come and pick up a flash

9 drive?

10 MR. ROSSMAN: Objection; assumes facts not

11 in evidence.

12 THE WITNESS: I did not think to do that.

13 BY MS. HARDY:

14 Q. You exchanged phone numbers with her when you were

15 meeting her at the FestiFall?

16 A. Yes.

17 Q. Did you exchange any other contact information with

18 her?

19 A. No.

20 Q. You were the first to text her, correct?

21 A. I'm not sure.

22 Q. Do you have any basis to dispute that you were the

23 first to text her?

24 A. Yes, I do have basis.

25 Q. What is that?

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1 A. I do not know if I texted her or if she texted me
2 first.

3 Q. You were the first to send her a Facebook message?

4 A. I do not know.

5 MR. ROSSMAN: You mean the first as between
6 them or the first person to ever?

7 BY MS. HARDY:

8 Q. You were the initiator of Facebook contact?

9 MR. ROSSMAN: Object to the form.

10 THE WITNESS: Are you asking me again?

11 BY MS. HARDY:

12 Q. Yes.

13 A. I do not know if I was the first to initiate contact
14 or not.

15 Q. Do you have any kind of notes, electronic, handwritten
16 or of any other variety that you could look to to
17 refresh your memory about your exchanges and
18 communications with Roe over the course of the time
19 that you knew her starting with the FestiFall in 2016
20 through your last contact with her in 2018?

21 A. The only time I wrote any notes about this whole
22 interaction was in my materials given to the various
23 committees at Wayne State.

24 Q. Starting in the fall of 2018?

25 A. Yes, that's correct.

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July 21, 2021

1 Q. Do you know --

2 A. Actually, I would say the winter of 2018.

3 Q. Do you know when Roe left Wayne State University?

4 A. I do not know exactly when.

5 Q. How did you learn that she had left Wayne State

6 University as a student?

7 A. I believe I saw something on Twitter.

8 Q. Do you know who had posted it on Twitter?

9 A. I assume her.

10 Q. And when did you see a Twitter message indicating that

11 she had left Wayne State University?

12 A. It would have been sometime in, I think, early 2017.

13 Q. Did you communicate with her through any social media

14 or text or email communications about why she'd left?

15 A. No.

16 Q. Did you communicate with her or anyone about her about

17 where she'd gone?

18 A. No.

19 Q. So you had no idea where she was; you just knew she

20 left?

21 A. At that time, yes.

22 Q. Okay. At what time did you learn something more

23 detailed?

24 A. After that there were other tweets that she had moved

25 to Colorado.

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July 21, 2021

1 Q. Those were tweets of hers?

2 A. Yes.

3 Q. When did you, and I'm sorry if I asked this before, I
4 don't recall that, but did you cancel your Twitter
5 feed with her or cancel her off of your Twitter feed?

6 A. I blocked her from my Twitter accounts, my Twitter
7 account after I got that racial slur phone call.

8 Q. Alright. And then you went back, this is I believe
9 your testimony, correct me if I'm wrong, you went back
10 during the time you were preparing statements to
11 explain yourself to Wayne State University and looked
12 at historical Twitter feeds by going onto the internet
13 and checking prior Twitter feeds; is that how you got
14 the Twitter information in November/December, 2018, to
15 prepare your statement?

16 A. Yes.

17 Q. Alright. So you'd blocked her previously?

18 A. Uh-huh.

19 Q. Correct?

20 A. That is correct.

21 Q. But you still had access to her Twitter feed despite
22 having blocked her?

23 A. I still had access, what do you mean?

24 Q. You were still able to review historical Twitter feeds
25 through the internet?

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1 A. Yes.

2 Q. Did you ever provide Roe with a user name and password
3 for any social media account of yours?

4 A. The iCloud account.

5 Q. Alright. Other than that?

6 A. No.

7 Q. Did you ask at any point in time for Roe's iCloud user
8 name and/or password?

9 A. Yes.

10 Q. When and why?

11 A. When was at various times while my accounts were being
12 hacked, and why was to stop my accounts from
13 continuing to be hacked.

14 Q. And were all those communications in which you made
15 such requests through either textbook or Facebook?

16 A. Can you repeat that?

17 MS. HARDY: Can you read it back.

18 (The requested portion of the record was
19 read by the reporter at 12:26 p.m. as
20 follows:

21 "Question: And were all those
22 communications in which you made such
23 requests through either textbook or
24 Facebook?")

25 MS. HARDY: I'm sorry. I'm going to

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1 rephrase that.

2 BY MS. HARDY:

3 Q. Were all those communications in which you made such
4 requests either through text messages or Facebook?

5 A. That is correct.

6 Q. Did she ever provide her user name and password to
7 you?

8 A. Yes.

9 Q. When was that?

10 A. I believe it was in -- I believe it was in 2017.

11 Q. Alright. And how did she provide that, through what
12 medium?

13 A. Through text message.

14 Q. Why did you need her iCloud user name and password to
15 solve your problem with your accounts being hacked?

16 MR. ROSSMAN: Objection; misstates his
17 testimony.

18 BY MS. HARDY:

19 Q. Did I misstate the reason you were asking for the
20 information?

21 MR. ROSSMAN: Objection. There's two
22 questions pending now.

23 BY MS. HARDY:

24 Q. Why did you ask for her user name and password on
25 iCloud?

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1 A. I thought that she had access to my accounts and that
2 our accounts were linked because she had logged in to
3 my account through her computer.

4 Q. So what was the purpose of asking for her user name
5 and password; how was that going to help solve your
6 problem?

7 A. It was to unlink the accounts from each other.

8 Q. Alright. Explain how that would have worked.

9 A. My understanding at the time was that if my account
10 was on her computer, we logged in to her account from
11 mine and then logged out, it would unlink the accounts
12 and solve the problem.

13 Q. Where did you obtain that understanding?

14 A. I searched online.

15 Q. Alright. And where online?

16 A. Various forums of, you know, when you have a problem
17 with a computer, usually Google it.

18 Q. So when you received her user name and password, did
19 you do exactly that?

20 A. Yes.

21 Q. Alright. And was it successful?

22 A. At the time, yes, I thought it was.

23 Q. And when was that?

24 A. That was the same day that she told me it.

25 Q. So sometime in 2017 you received her user name and

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1 password, you logged on to her account, and you
2 de-linked your account and hers?

3 A. And then logged out, that's correct.

4 Q. And that solved the problem?

5 A. For the time being, yes.

6 Q. Okay. And do you recall what user name and password
7 she gave you?

8 A. I do not.

9 Q. Do you have any record anywhere of the user name and
10 password?

11 A. I do not except in the testimony that she provided in
12 her report. I believe it's in there.

13 Q. After she provided you her user name and password and
14 you entered those and de-linked your accounts, did you
15 have a subsequent problem that developed with respect
16 to your account?

17 A. I had continuous problems after that with multiple
18 accounts.

19 Q. Alright. What accounts?

20 A. I mean, a whole lot of accounts, iCloud, Google, my
21 PlayStation account, you know, my Instagram, my
22 Snapchat, my Facebook and many more, you know, just
23 accounts that you have, my Capital One account, my
24 Chase account, my Flagstar account.

25 Q. Did you attribute any of those problems to her?

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1 A. Yes.

2 Q. Why?

3 A. Because she was the only one that had access to my
4 iCloud account.

5 Q. Did you change your iCloud password after you provided
6 her your password and user name?

7 A. I changed my iCloud password after the first time
8 where I got the alert saying that it was authorized
9 without my access.

10 Q. When was that?

11 A. That was a couple, I think it was two months after we
12 met, so, it would have been in September or October of
13 2016.

14 Q. Alright. So when you provided her in August, 2016,
15 your user name and password for iCloud and she gets
16 onto your computer, you don't think to change your
17 password after that?

18 MR. ROSSMAN: Objection; argumentative.

19 BY MS. HARDY:

20 Q. Did you think about that?

21 A. She didn't get on my computer.

22 Q. She got onto your account?

23 A. Yes, on her computer.

24 Q. Through her computer and you didn't think to change
25 your password following that?

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1 A. No.

2 Q. Alright. So then you got an alert sometime in the
3 fall of 2016 that somebody had accessed your account?

4 A. Yes.

5 Q. And at that point in time, you changed your password?

6 A. Yes.

7 Q. Okay. And you continued to have problems after that?

8 A. Yes.

9 Q. Why did you attribute those problems after that to
10 Roe?

11 A. They were accounts with the same password as my
12 original iCloud password.

13 Q. Repeat that.

14 A. They were accounts with the same password as my
15 original iCloud password that Roe had.

16 Q. I don't understand what you're saying. What accounts
17 are you referring to?

18 A. The other accounts that were accessed without my
19 authorization.

20 Q. They had the same password as your iCloud password?

21 A. Yes.

22 Q. And user name?

23 A. I already told you the user names.

24 Q. So your Google account had the same user name and
25 password as your iCloud account at the time you gave

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1 access to Roe in August, 2016?

2 A. Yes.

3 Q. Alright. And the same for PlayStation?

4 A. Yes.

5 Q. And the same for Instagram?

6 A. Yes.

7 Q. And the same for Facebook?

8 A. Yes.

9 Q. Same for Capital One?

10 A. Capital One, the user name was different slightly, but

11 the password was the same.

12 Q. And what about Flagstar; was the user name and

13 password for Flagstar the same as your iCloud account

14 in 2016 when you gave that information to Roe?

15 A. The user name was slightly different but the password

16 was the same.

17 Q. What was your user name at Capital One?

18 A. I believe it was anth.eid.

19 Q. And your user name at Flagstar?

20 A. Anthony.eid.

21 Q. So did you suspect anyone else of hacking your

22 accounts, iCloud, Google, other than Roe?

23 A. I did not.

24 Q. And the reason you suspect her, the only reason you

25 suspect her of hacking them is because you gave her

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1 your iCloud user name and password in August, 2016,
2 and there was either identical user name and passwords
3 with your other accounts or very close with the user
4 names?

5 A. That is correct in 2016 and 2017 why I believe that.

6 Q. And what about 2018?

7 A. In 2018, I believed it was Roe accessing my account
8 because at that time, I guess as technology developed,
9 when someone logs into your Apple account, you get a
10 message on your phone with a map of where the log-in
11 took place, and that log-in had taken place from
12 Colorado.

13 Q. So that led you to believe that any hacking of any of
14 your accounts that occurred in 2018 or early '19 was
15 attributable to her because you got notification from
16 Apple that someone had logged in from Colorado?

17 MR. ROSSMAN: Object to the form; compound,
18 vague and ambiguous, misstates his testimony.

19 BY MS. HARDY:

20 Q. You can go ahead.

21 A. It alerted me that -- it made me think that my
22 suspicions were correct.

23 Q. Did you have any other basis in 2018 or early 2019 for
24 suspecting Roe of hacking your accounts other than the
25 Apple ID message you received?

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1 A. That was -- that and the fact that she was the only
2 one that had access to my iCloud account.

3 Q. But she no longer had access to your iCloud account,
4 correct, as of that time because you changed the
5 password?

6 MR. ROSSMAN: Argumentative. Don't answer
7 the question. It makes no sense. If you could please
8 rephrase that.

9 BY MS. HARDY:

10 Q. She no longer had access to your iCloud account in
11 2018 or '19, correct?

12 MR. ROSSMAN: That has been so asked and
13 answered. The record is clear. Why do you keep
14 asking the same questions over and over?

15 MS. HARDY: Counsel, you know, just these
16 kinds of statements by you --

17 MR. ROSSMAN: You're doing it to wear the
18 witness down, and I understand the strategy and you
19 want your summations, but seriously, we know what date
20 she stopped having access. Stop asking the question,
21 please.

22 MS. HARDY: No. You know what? I'm in
23 charge of asking my own questions. You can make form
24 objections, and if you have a problem with my
25 questions or how I'm conducting this deposition, Judge

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1 Magistrate Grand is available to hear whatever your
2 issues are.

3 MR. ROSSMAN: I am not going to bother the
4 judge. I'll deal with it myself. If you keep asking
5 the same question over and over and over again, I will
6 continue to object, and I'll let him answer, but it's
7 seriously getting to the point where I'm going to have
8 to start directing him not to answer because you know
9 what the record says. You're trying to trip him up.
10 Stop asking the same question over and over. You know
11 exactly when she stopped having access. He testified
12 in-depth about it.

13 MS. HARDY: Counsel, don't interfere with
14 my questions. Make your form objections. If you have
15 a problem, take it to the judge, but I'm not going to
16 sit here and let you constantly run interference,
17 distract, try to disrupt the deposition with all your
18 distractions. That is not professional, it's not
19 allowed under the rules, and it will end up in front
20 of the judge if you don't cease behaving that way.

21 MR. ROSSMAN: I'll count up all the times
22 you asked the same question over and over to drag this
23 out, wear him down, trip him up. I know what you're
24 doing. Please, ask a question and when you -- if you
25 don't get a clear answer, Cross him on it. I'm not

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1 going to stop you. But if you get a clear answer,
2 it's not okay to keep asking it.

3 MS. HARDY: Lezlie, we need to go back.

4 (The requested portion of the record was
5 read by the reporter at 12:26 p.m. as
6 follows:

7 "Question: She no longer had access to
8 your iCloud account in 2018 or '19,
9 correct?")

10 BY MS. HARDY:

11 Q. Please answer.

12 A. I don't know if she had access to my iCloud account or
13 not.

14 Q. How would she have access if you had changed your
15 password back in 2016?

16 MR. ROSSMAN: Argumentative. It's
17 argumentative. He just answered the question. He
18 said he didn't know.

19 MS. HARDY: Counsel, this is you --

20 MR. ROSSMAN: He doesn't know.

21 MS. HARDY: You are not supposed to be on
22 the record in this fashion. I have a right to ask
23 questions.

24 MR. ROSSMAN: Should I leave the room?
25 Should I not be here?

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1 MS. HARDY: You can object on a form basis.
2 You are being thoroughly inappropriate, and I'm not
3 going to continue under these --

4 MR. ROSSMAN: How am I being thoroughly
5 inappropriate?

6 MS. HARDY: We're going to cease this
7 deposition, and I will go to the judge because I need
8 to be able to proceed without you interfering with
9 every question.

10 MR. ROSSMAN: We will be moving for this
11 deposition to appear under court supervision because
12 your questions are argumentative. You're patronizing
13 the witness. The facial expressions on your side of
14 the table don't stop. You fight with me when I make
15 an objection. If you want to go take it before the
16 judge, fine. We'll ask that it be done in court or by
17 Zoom because they don't let us do it in court. So if
18 you're --

19 Let the record reflect that the deposition
20 is being terminated right now by defense counsel.
21 We're here. He's ready to testify. I'm not going
22 anywhere unless you tell me it's terminated.

23 MS. HARDY: I'll ask him my question again.
24 Let him answer the question.

25 MR. ROSSMAN: Are you terminating the

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1 deposition?

2 MS. HARDY: I'm going to ask my question
3 again and see if you can let him answer the question.

4 MR. ROSSMAN: Ask the question.

5 Why are you laughing?

6 MS. HARDY: I'm trying to develop some
7 sense of humor about the --

8 MR. ROSSMAN: You're laughing on the
9 record. Ask your question.

10 MS. HARDY: Can you read it back, please.

11 (The requested portion of the record was
12 read by the reporter at 12:39 p.m. as
13 follows:

14 "Question: How would she have access if
15 you had changed your password back in
16 2016?")

17 THE WITNESS: Just because I changed my
18 password does not mean she didn't still have access to
19 my accounts.

20 BY MS. HARDY:

21 Q. Well, from a technology standpoint, what is your
22 theory as to how she would have access to your
23 accounts in 2018 and '19 if she did not have your
24 passwords?

25 A. I don't know if she had my passwords or not. She may

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1 still have had my passwords.

2 Q. But you testified you changed all your passwords?

3 A. Right, exactly. She may have had the new ones.

4 Q. How would she have gotten the new ones?

5 A. Well, the new ones weren't too different from the old
6 ones.

7 Q. Since you won't give me your passwords, I can't
8 evaluate that and follow up on it, but they were
9 different, correct?

10 A. They were slightly different.

11 Q. Alright. So you are suspecting that she somehow
12 figured out what your new passwords were on her own?

13 MR. ROSSMAN: Objection; misstates his
14 testimony.

15 BY MS. HARDY:

16 Q. How would she know, just by guessing and trying a
17 bunch of different passwords and getting lucky?

18 MR. ROSSMAN: Objection; calls for
19 speculation.

20 BY MS. HARDY:

21 Q. Answer the question.

22 A. That is one possibility.

23 Q. Do you have theories as to any other possibilities as
24 to how she could be the person responsible for hacking
25 your accounts in 2018 and '19?

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1 A. Like I said, I got the notification that it was
2 accessed from Colorado. Also, because she had access
3 to my iCloud account, there was also information on my
4 iCloud account that could have led her to my password,
5 such as notes that were stored on my iPhone, different
6 photos of, you know, things like my ID, my Social
7 Security card, credit cards, stuff like that.

8 Q. Alright. So let's hypothetically assume she knew your
9 Apple user name or ID and password. How would that
10 give her access to Snapchat, Instagram, PlayStation,
11 Flagstar, Capital One, etcetera, since they don't use
12 Apple password and ID?

13 MR. ROSSMAN: Objection because the
14 question started out with an improper hypothetical
15 and, therefore, calls for speculation. The remainder
16 of the question was compound and confusing.

17 BY MS. HARDY:

18 Q. Answer, please.

19 A. Can you repeat it?

20 MS. HARDY: Can you read it back.

21 (The requested portion of the record was
22 read by the reporter at 12:42 p.m. as
23 follows:

24 "Question: So let's hypothetically assume
25 she knew your Apple user name or ID and

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1 password. How would that give her access
2 to Snapchat, Instagram, PlayStation,
3 Flagstar, Capital One, etcetera, since they
4 don't use Apple password and ID?")

5 THE WITNESS: I think I already stated that
6 the passwords for those were the same as my original
7 iCloud password.

8 BY MS. HARDY:

9 Q. But they had changed in the fall or October, '16?

10 A. Only the iCloud password changed. The other passwords
11 changed as I was being hacked.

12 Q. So just to make sure I'm clear, the only information
13 that you're aware of that Roe ever had about your
14 accounts was your iCloud user name and password as of
15 August, 2016?

16 A. No, that is not correct.

17 Q. What other information did she have about either the
18 iCloud or any other account that would have led you to
19 believe or did lead you to believe that she might have
20 been the person responsible for hacking your accounts?

21 A. I think I already stated the map that I got from
22 iCloud saying that my account was accessed from
23 someone in Colorado, and the fact that she had access
24 to my iCloud account means she had access to a lot of
25 information about me. What that information is I

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1 don't know, but she could have had that.

2 Q. Do you know what was stored in your iCloud account
3 that could have provided her with access information
4 for Capital One, Flagstar, and other accounts?

5 A. There was information such as my Social Security card,
6 my ID.

7 Q. What ID?

8 A. My driver's license, pictures of my credit cards,
9 various information like that, notes that stored
10 information. I may have stored the passwords for my
11 other accounts in the notes app so I wouldn't forget
12 them. That's a possibility. There's a lot of
13 possibilities.

14 Q. Alright. So you're thinking of possibilities, but you
15 can't think of anything specific that you know was in
16 iCloud that she could have gotten access to and,
17 therefore, used it to hack accounts other than what
18 was there as of August, 2016?

19 MR. ROSSMAN: Objection; improper form and
20 argumentative.

21 THE WITNESS: No. I think I said many
22 specifics just now actually.

23 BY MS. HARDY:

24 Q. Are you sure your Social Security Number was in there?

25 A. Yes.

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1 Q. And you're sure your driver's license?

2 A. Yes.

3 Q. What else are you sure was in there?

4 A. I'm sure that photos of my credit cards were on there.

5 I'm sure that she had access to my notes.

6 Q. And what was in your notes?

7 A. So I'm not sure exactly what was in my notes, I don't
8 recall, but she could have gained information about my
9 passwords from the information that were stored in my
10 notes.

11 Q. Alright. Are the notes that you had stored in iCloud
12 as of August, 2016, are they still in iCloud?

13 A. No. Those were -- I deleted those for security
14 reasons as I was being hacked.

15 Q. Alright. And do you have any way of recalling what
16 was in those notes as of today?

17 A. I think I just did.

18 Q. I just asked you what was in those notes and you're
19 speculating; you don't recall, correct?

20 MR. ROSSMAN: Objection; very
21 argumentative.

22 BY MS. HARDY:

23 Q. Do you recall what was in those notes?

24 A. No, I do not recall specifically what was in those
25 notes.

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1 Q. And when you qualify your answer with specifically, is
2 there anything specific you recall that was in the
3 notes?

4 A. There are a lot of things in my notes.

5 Q. Do you recall anything that was in them?

6 A. No.

7 Q. Alright. Thank you. Did you ever provide Roe with
8 your bank account information?

9 A. No.

10 Q. Did you ever provide her with any financial
11 information for business purposes only?

12 A. No.

13 Q. Have you ever set up a cash app account that connects
14 to a bank account of yours?

15 A. Yes.

16 Q. Which ones have you used?

17 A. Which what have I used?

18 Q. Which cash apps?

19 A. So Cash App is the name of a specific app that I have
20 used in the past.

21 Q. Okay. Have you used like a Venmo or any of the
22 others?

23 A. Yes, I've used Venmo, I've used Apple Pay, and I've
24 used PayPal.

25 Q. Any others?

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1 A. You can certainly send money through other apps. You
2 can send money through Snapchat, for example.

3 Q. Have you actually sent money through any app other
4 than the ones you listed?

5 A. I have not personally sent money, no.

6 Q. Okay. Have you ever sent money through any pay app
7 just to make sure I'm clear?

8 A. Yes, before that I listed previously.

9 Q. The Cash App, Venmo, Apple Pay, and PayPal?

10 A. Yes.

11 Q. So what was your user name and password for Cash App?

12 MR. ROSSMAN: Objection to the password.

13 BY MS. HARDY:

14 Q. User name?

15 A. I believe Cash App uses your phone number actually.

16 Q. Okay. Venmo?

17 A. I believe Venmo also uses your phone number. However,
18 it also uses a user name, and that was anthony.eid1.

19 Q. Okay. And your counsel is objecting to the password,
20 so I'll move to Apple Pay. Your user name?

21 A. Apple Pay is tied to the Apple ID which I already gave
22 you.

23 Q. So it's the same Apple ID and password?

24 A. Exactly.

25 Q. And PayPal, your user name?

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1 A. It is the same as my Gmail email address.

2 MS. HARDY: And your counsel is objecting
3 to the password, so I'll move on.

4 MARKED FOR IDENTIFICATION:

5 EXHIBIT 3

6 Email forwarded message
7 dated 10-25-2018 from Wolff Law
8 12:49 p.m.

9 MS. HARDY: Let the record reflect that I'm
10 showing the witness Exhibit Number 3 which has been
11 Bates Stamped 52 and 53.

12 For the record, page 52 consists of an
13 email dated October 25 from
14 wolffsmithlawfirm@gmail.com, and it is redacted, and
15 so is the Hello Ms. and the name after Ms. is
16 redacted.

17 BY MS. HARDY:

18 Q. You understand this was an email purportedly sent by
19 the Wolff law firm to Roe, correct?

20 A. If that's what you're telling me it is.

21 Q. You don't know that looking at this?

22 A. Who it's from and to is redacted.

23 Q. You're familiar with this document, correct?

24 A. No.

25 Q. You've never seen it?

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1 A. The only time I saw this document was when we received
2 it from you guys in deposition. I had not seen it
3 beforehand, even though I asked for it many times I
4 should add.

5 Q. So without seeing an unredacted copy of this document,
6 you don't know who this email was sent to?

7 A. No. How am I supposed to know that? No.

8 MS. HARDY: Okay. We'll go back to this
9 one later on.

10 Let the record reflect I'm marking as
11 Exhibit Number 4 a copy of the complaint that was
12 filed by Roe, and it is Bates Stamped 207 and 208, a
13 copy for counsel.

14 MARKED FOR IDENTIFICATION:

15 EXHIBIT 4

16 Wayne State University

17 Complaint Form

18 12:51 p.m.

19 BY MS. HARDY:

20 Q. You have seen a copy of this, correct?

21 A. Yes.

22 Q. When did you first see it?

23 A. I first saw it when Dr. Jackson showed it to me during
24 my meeting before my meeting with the Professionalism
25 Committee.

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1 Q. Do you recall the date?

2 A. Not off the top of my head.

3 Q. It was prior to the hearing?

4 A. It was prior to the hearing.

5 Q. Do you recall the date of the hearing?

6 A. The date of the hearing I do not recall. I believe it
7 was early February.

8 Q. Okay. February 7, does that sound familiar?

9 A. That sounds like it could be correct.

10 Q. Alright. 2019?

11 A. Yes.

12 Q. Do you recall seeing Exhibit Number 4 on January 25,
13 2019?

14 A. Was that my meeting with Dr. Baker?

15 Q. Do you recall a meeting in which you saw this document
16 on January 25, 2019?

17 A. The only time I saw this document was during my
18 meeting with Dr. Jackson prior to my meeting on
19 February 7th.

20 Q. And I'm asking you if the date of January 25, 2019,
21 refreshes your memory as to the date of that meeting
22 with Dr. Jackson?

23 A. If that is the date of the meeting with Dr. Jackson,
24 then yes.

25 MR. ROSSMAN: You either know or you don't

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1 know.

2 THE WITNESS: I do not know. That doesn't
3 help me recall the date of that meeting.

4 MS. HARDY: That was an inappropriate
5 interjection.

6 MR. ROSSMAN: I disagree that it was an
7 inappropriate interjection.

8 MS. HARDY: For the record, I am marking as
9 Exhibit Number 5 a letter dated November 27th, 2018.
10 It's addressed Dear Anthony, and it's signed by
11 Nikolina Camaj, with a copy to counsel.

12 MARKED FOR IDENTIFICATION:

13 EXHIBIT 5

14 Letter dated November 27, 2018
15 to Anthony Eid from Nikolina Camaj
16 12:54 p.m.

17 BY MS. HARDY:

18 Q. This document is Bates Stamped up in the corner in
19 very small numbers AE000281. This was produced by
20 your counsel in response to a document request filed
21 by the defendant.

22 Do you recognize this document?

23 A. Yes, I do.

24 Q. Alright. And you received this document on or about
25 November 27, 2018, correct?

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1 A. That's what it says.

2 Q. And you're not disputing that date, are you?

3 A. No.

4 Q. Alright. Did you keep any notes such as on a calendar
5 or in any other fashion of the communications you had
6 with Wayne State University officials about the
7 investigation that led to your dismissal?

8 A. Did I keep a calendar of communications?

9 Q. Or notes. Did you record anywhere when you talked to
10 people, either verbally, in person, when you had
11 meetings; do you have any way of reconstructing other
12 than just through your recall when different
13 communications occurred?

14 A. I have the dates of the email communications, but
15 those are the only dates that I have.

16 Q. And by email communications, you're referring to
17 emails that you received from Wayne State University
18 officials?

19 A. Or sent, received or sent.

20 Q. Or sent?

21 A. Yes, that is correct.

22 Q. You don't have any independent written documentation
23 that you could look to to reconstruct when different
24 communications occurred?

25 MR. ROSSMAN: Object to the word

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1 independent. It's vague.

2 THE WITNESS: No.

3 BY MS. HARDY:

4 Q. Thank you. Do you recall receiving a call on
5 November 15, 2018, from Nikolina Camaj notifying you
6 that there had been a complaint filed that she would
7 need to discuss with you?

8 MR. ROSSMAN: Objection; assumes facts not
9 in evidence.

10 BY MS. HARDY:

11 Q. Do you recall receiving a call on that date concerning
12 the topic I just described?

13 A. And you said November 15th, 2018?

14 Q. Yes.

15 A. I'm quite sure that did not happen.

16 Q. And how are you sure it did not happen?

17 A. Because I think I would remember if that happened.

18 This document, Exhibit 5, was the first that I had
19 heard about Ms. Camaj wanting to meet with me.

20 Q. Do you recall receiving a phone call from or a
21 communication from Nikolina Camaj on November 30th
22 indicating that she wanted to meet with you about a
23 complaint that had been filed?

24 A. Can you repeat that?

25 Q. Yes. Do you recall receiving a communication with

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1 Nikolina Camaj on November 30th, 2018, indicating that
2 she wanted to meet with you about a complaint that had
3 been filed?

4 MR. ROSSMAN: Objection; assumes facts not
5 in evidence.

6 THE WITNESS: No.

7 BY MS. HARDY:

8 Q. You have no recollection one way or another?

9 A. I mean, my meeting with her was scheduled for
10 November 30th. So, no, I did not receive a phone call
11 from her about that meeting. I showed up in her
12 office.

13 Q. Do you recall when you were notified of the
14 November 30th meeting date; was that in Exhibit 5?

15 A. That's this email right here.

16 Q. Alright. So then on November 27, you received
17 electronic communication from Nikolina Camaj
18 indicating that there had been a complaint filed and
19 that she wanted to speak with you on November 30th at
20 12 p.m. in the dean's office?

21 A. That is not correct.

22 Q. What is not correct about that?

23 A. This email does not say that a complaint had been
24 filed against me.

25 Q. It has a case number, correct?

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1 A. It does have a case number.

2 Q. Okay. And it says it's going to be a fact-finding

3 conference concerning a case, correct?

4 A. No, that's not what it says.

5 Q. It has a case number and it says it's going to be a

6 fact-finding conference to discuss concerns reported

7 to me about your alleged behavior on campus?

8 MR. ROSSMAN: Objection. The document

9 speaks for itself.

10 BY MS. HARDY:

11 Q. That's what it says, correct?

12 A. That is what it says, yes.

13 MR. ROSSMAN: In part.

14 BY MS. HARDY:

15 Q. Which could be in violation of the Student Code of

16 Conduct, correct?

17 A. Uh-huh.

18 Q. You've got to verbalize your answer.

19 A. Yes.

20 MR. ROSSMAN: Are you asking if that's what

21 the document says or if that's what he thinks? I

22 mean, are you just asking him to read the document

23 because we can read the whole thing into the record.

24 BY MS. HARDY:

25 Q. Did you understand when you read Exhibit 5 that there

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1 had been a complaint filed, a fact-finding conference
2 would be held and that the complaint concerned a
3 potential violation about your behavior that could be
4 in violation of the Student Code of Conduct?

5 MR. ROSSMAN: I'm going to object to the
6 form, and it assumes facts not in evidence.

7 BY MS. HARDY:

8 Q. Did you understand that?

9 A. Absolutely not.

10 Q. So what was your confusion about that being the
11 purpose of the meeting with Ms. Camaj?

12 MR. ROSSMAN: Objection; it misstates his
13 testimony. I don't recall him talking about being
14 confused about anything.

15 BY MS. HARDY:

16 Q. Answer the question, please.

17 A. Can you restate it, please?

18 Q. When you read Exhibit Number 5, which is an electronic
19 communication you received on November 27th, and it
20 specifically tells you there's a case number, there's
21 going to be a fact-finding conference to discuss with
22 you your alleged behavior which could be in violation
23 of the Student Code of Conduct, you did not understand
24 that there had been a complaint filed about you?

25 A. I absolutely did not understand that, and I replied to

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1 her twice telling her that I did not understand that.

2 Q. Were you not understanding that a complaint had been
3 filed, or were you complaining about the fact that you
4 were not told in advance of your meeting the specifics
5 of the complaint?

6 A. No. I did not understand that a complaint had been
7 filed against me.

8 Q. Alright. So you met with Ms. Camaj on the 30th of
9 November, correct?

10 A. That's correct.

11 Q. And following your meeting with Ms. Camaj, you
12 prepared a written statement responding to the
13 allegations that were being made about you, correct?

14 A. I prepared a statement, but I did not know the
15 allegations being made about me.

16 Q. Alright. So you didn't know any of the allegations
17 that had been made about you?

18 A. All I knew was what Ms. Camaj communicated to me
19 through our meeting.

20 Q. And what was that?

21 A. I mean, she communicated a lot of things. I don't
22 remember exactly. Do you want to be more specific or
23 something?

24 Q. What did you learn from Camaj about the allegations
25 that had been made against you?

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1 A. At that time during the meeting, I learned that Roe
2 had filed a complaint against me.

3 Q. Okay. And what did you learn about the substance of
4 the complaint?

5 A. Not much.

6 Q. What did you learn?

7 A. I learned that she filed a complaint against me, and
8 she included the text messages that I had sent to her,
9 and Ms. Camaj asked me about those text messages.

10 Q. Is that all you learned during that meeting?

11 A. That's all I recall.

12 MS. HARDY: Okay. So in response to the
13 substance of what you learned on November 30th when
14 meeting with Ms. Camaj about the complaint that had
15 been filed by Roe, you prepared a written statement
16 which was three pages with an attachment, and I will
17 show that to you in a moment, and I will mark that as
18 Exhibit Number 6.

19 MARKED FOR IDENTIFICATION:

20 EXHIBIT 6

21 Emails between Anthony Eid and

22 Nikolina Camaj with Statement

23 Regarding Reported Incident attached

24 1:03 p.m.

25 MS. HARDY: Exhibit Number 6 for the record

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1 has been Bates Stamped 214 through 218, and 214 is an
2 email from Anthony Eid to Nikolina Camaj in which he
3 is attaching a statement and offering to submit an
4 apology letter.

5 BY MS. HARDY:

6 Q. Do you see that?

7 A. Yes, I do.

8 Q. Okay. And then attached to this email is the
9 statement that was submitted; is that correct?

10 A. Yes.

11 Q. Okay. So 215 through 218 is a document you prepared,
12 correct?

13 A. That is correct.

14 Q. It's entitled Statement Regarding Reported Incident,
15 correct?

16 A. Yes.

17 Q. Alright. And you're the author of this statement?

18 A. Yes.

19 Q. Did anyone have any input into the content of the
20 statement other than you?

21 A. Yes.

22 Q. Who?

23 A. Ms. Camaj.

24 Q. Well, she didn't help draft your statement for you,
25 did she?

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1 A. That's correct.

2 Q. Alright. What input did she have into the content of
3 the statement?

4 A. During our meeting, she asked me to write a statement,
5 and I asked her what she would like to see in the
6 statement.

7 Q. And what do you claim she said?

8 A. I don't remember what she said.

9 Q. Alright. And you don't have any notes of what she
10 said, correct?

11 A. I do not.

12 Q. Alright. So you wrote this statement on your own,
13 correct?

14 A. Yes.

15 Q. And submitted it to Ms. Camaj on December 4, 2018?

16 A. Yes.

17 Q. In this statement, were these genuine and truthful
18 representations that you made in this statement?

19 A. I believe they were.

20 Q. Okay. Did you submit to Ms. Camaj an apology letter
21 for Roe at this time?

22 A. No.

23 Q. You wanted to submit one, though, because what you had
24 done did not sit well with your conscience, correct?

25 A. I offered to write an apology letter.

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1 Q. Because, quote, what took place does not sit well with
2 my conscience, correct?

3 A. That is what this says.

4 Q. Okay. And that's what you meant, right?

5 A. I'm not sure what I meant at the time of writing this
6 letter, but I did offer to write an apology letter if
7 the school deemed that appropriate.

8 Q. Alright. So when you put together this three-page
9 statement or two-and-a-half page statement, you were
10 responding to information you'd learned from Ms. Camaj
11 on November 30th, correct?

12 A. That's correct.

13 Q. Alright. And you were providing your kind of answer
14 to that information, correct?

15 A. To the information that was given to me, yes.

16 Q. Alright. And you indicate that you also provided a
17 screenshot of the private calls that I had with you to
18 this email regarding the racial slur speech. Is that
19 page 218?

20 A. Yes.

21 Q. Alright. So where did you get a copy of 218; where
22 did that screenshot come from?

23 A. That is a screenshot from my iPhone.

24 Q. From your iPad?

25 A. iPhone.

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1 Q. iPhone, okay, and when did you make that screenshot,
2 what day?

3 A. I am not sure what day I made that screenshot.

4 Q. Between November 30th and December 4?

5 A. No. It was probably before November 30th. It was
6 probably -- I don't know the date I made the
7 screenshot.

8 Q. Alright. So did you ever find out who the no caller
9 ID calls were from?

10 A. No.

11 Q. And were there any messages left on any of the calls
12 which are identified as no caller ID?

13 A. No.

14 Q. Alright. The message from Colorado Springs with the
15 phone number 719.418.5394, did you actually speak to
16 that person?

17 A. Yes.

18 Q. And did you have a dialogue with them?

19 A. That is the call with the racial slur.

20 Q. Alright. So tell me everything you recall about that
21 phone call.

22 A. I answered the phone. There was a woman speaking.

23 Q. Did you recognize the voice?

24 A. I did not recognize the voice, no, but it was a woman
25 speaking, and it said something along the lines of: I

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1 can't wait to get you deported, you dirty Arab.

2 Then I hung up the phone.

3 Q. Do you have an audio recording of that call?

4 A. No.

5 Q. Did you make any effort to figure out who was the
6 caller, who that number was attributable to?

7 A. Can you clarify the question?

8 Q. Did you make any efforts to determine whose phone
9 number that was?

10 A. No.

11 Q. Have you at any point in time been able to determine
12 whose phone number that was?

13 A. No.

14 Q. Do you have any reason to believe that it's Roe's
15 phone number?

16 A. Yes.

17 Q. Based on what?

18 A. Based on where the location of the call is coming
19 from.

20 Q. Strictly the fact that it's from Colorado Springs,
21 Colorado leads you to think it's Roe?

22 MR. ROSSMAN: Asked and answered.

23 THE WITNESS: Yes.

24 BY MS. HARDY:

25 Q. Why did you not try to figure out whose phone number

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1 that was?

2 A. I was busy studying.

3 Q. Do you still have on your phone the phone messages

4 that are reflected in this screenshot?

5 A. What do you mean by phone messages, and what do you

6 mean by in your phone as well?

7 Q. It's under recents under your phone?

8 A. Uh-huh.

9 Q. Did you leave these no caller ID and this phone number

10 719.418.5394, did you leave those calls in your

11 recents list?

12 A. This was three or four years ago, it's no longer

13 recent, so, no.

14 Q. Well, if you don't delete it, it's still there, isn't

15 it?

16 MR. ROSSMAN: Objection; misstates. It

17 lacks foundation. It's wrong.

18 BY MS. HARDY:

19 Q. Is that not accurate that if you leave it there, it

20 remains there as part of the record?

21 A. I think that's completely inaccurate.

22 Q. Do you think it falls away after a certain period of

23 time?

24 A. Exactly, I think it falls away as new calls come into

25 your call log.

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1 Q. Alright. If you believed that that was Roe who had
2 made that call and had uttered a racial slur, why
3 didn't you report it?

4 A. Report it to who?

5 Q. Report it to the police, report it to Wayne State,
6 report it to somebody?

7 A. I was a busy medical student involved in many other
8 activities, extracurricular with many responsibilities
9 and exams coming up. I thought that the best course
10 of action was to block Roe from all communication and
11 then move forward focusing on my exams.

12 Q. Why did you take a screenshot of these messages?

13 A. Because I was scared.

14 Q. Why did you delete the messages?

15 A. What messages?

16 Q. The recents?

17 MR. ROSSMAN: Objection; misstates his
18 testimony.

19 THE WITNESS: I don't believe I ever said I
20 deleted the recents.

21 BY MS. HARDY:

22 Q. So if you're preserving the log of recent calls for
23 the sake of something that you think is attributable
24 to Roe, why did you delete all, at the same time
25 delete all the text messages and Facebook messages

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1 with her?

2 A. After I received that call who I believed to be Roe, I
3 deleted -- I first blocked her from my phone and my
4 social media accounts and then deleted the messages
5 because I no longer wanted any communications with
6 her.

7 Q. Alright. When did you block her; do you have a date?

8 A. It would have been on that date where the call was
9 made.

10 Q. Alright. And you cannot identify what day this is?

11 A. I believe it's in this statement. It says
12 October 27th.

13 Q. Doesn't that date appear on the screenshot which is
14 page 218?

15 A. I suppose because that date wasn't displayed on my
16 phone when I took this screenshot.

17 Q. Do you still have the original screenshot on your
18 phone?

19 A. I don't believe I have it on my phone anymore, but I
20 have it -- it might be on my phone. I don't know.

21 Q. Do you have your phone on you right now?

22 A. Yeah.

23 Q. Can you pull it out, please?

24 MR. ROSSMAN: We're not going to do that.
25 We'll check on a break and let you know.

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1 BY MS. HARDY:

2 Q. Can you think of any reason you would have deleted the
3 screenshot from your phone?

4 A. Yeah, I can think of a lot of reasons why I would have
5 deleted it.

6 Q. Why?

7 A. If my phone storage was full, if I had already emailed
8 it to myself for recordkeeping.

9 Q. Did you email it to yourself for recordkeeping?

10 A. At some point I did.

11 Q. What email did you send it to?

12 A. I don't remember which email I sent it to.

13 Q. Alright. If you made a screenshot on your phone, it
14 goes into your photo app, correct?

15 A. Uh-huh.

16 Q. And the date will appear in that photo on the photo
17 app of the screenshot, correct?

18 A. I believe so.

19 Q. Okay. So if we need to verify a date, the way to do
20 it is through your phone, correct?

21 A. I think there are a lot of ways to verify it.

22 Q. What other ways could we verify it?

23 A. You could verify it -- I think there are other ways to
24 verify it, but I'm not sure about what they might be.

25 Q. What other ways are there that you're aware of; do you

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1 have any ideas?

2 A. Well, if I email it to myself, we could check the date
3 that I emailed it to myself.

4 Q. And what email would you have used?

5 A. One of my emails.

6 Q. And you have no idea which one?

7 A. I do not.

8 Q. Alright. So just to make sure you're on notice, you
9 are not to alter in any fashion any
10 electronically-stored information or hard-copy
11 documents that pertain in any way to the underlying
12 facts of this litigation, alright?

13 MR. ROSSMAN: Hold on. The witness has
14 been instructed by your correspondence and the Court
15 Rules and he is represented by counsel, and if you
16 harass him on instructions regarding his document
17 preservation or how he manages evidence in this case,
18 that's something that would tend toward mitigating
19 toward doing this deposition under court supervision.

20 As I indicated at the beginning of this
21 deposition, I will only allow him to be asked
22 questions. You're not going to talk at him and
23 threaten him. He's well aware of his document
24 preservation obligations, and if you want to ask that
25 we search for that and produce it on the break at

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1 lunch if we can find it, we'd be happy to do so.

2 MS. HARDY: I'd appreciate it if you'd do

3 so.

4 MR. ROSSMAN: We will do it.

5 MS. HARDY: Are you done?

6 MR. ROSSMAN: Was I talking or did I make

7 an offer to look for something and produce it to you

8 on the break?

9 MS. HARDY: Do you have anything further to

10 say on the record before I proceed?

11 MR. ROSSMAN: I'm not answering that

12 question. If I have something to say, I'll say it.

13 MS. HARDY: Why don't we take a lunch

14 break.

15 MR. ROSSMAN: Okay. How long?

16 MS. HARDY: Half an hour.

17 MR. ROSSMAN: Alright. If we find that,

18 we'll email it to you.

19 (Recess taken at 1:17 p.m.)

20 (Back on the record at 1:57 p.m.)

21 MS. HARDY: Let the record reflect I'm

22 marking as Deposition Exhibit Number 7 an email from

23 M. Jackson to Anthony Eid dated December 14, 2018,

24 Bates Stamped 362.

25 MARKED FOR IDENTIFICATION:

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1 EXHIBIT 7

2 Email dated 12-14-2018 to

3 Anthony Eid from M. Jackson

4 1:58 p.m.

5 BY MS. HARDY:

6 Q. Can you identify for the record that this is an email

7 that you received?

8 I'm handing a copy to the witness and a

9 copy to counsel.

10 Take a moment to review it and confirm you

11 received this email.

12 A. Yes, I received this email.

13 Q. Alright. Did you ask any questions about the content

14 of the email of anyone?

15 A. I may have. I don't remember if I did or not.

16 Q. Alright. You don't have any recall of that or record

17 of that, correct?

18 A. I would have to look if there's a record of that or

19 not.

20 Q. Well, I've asked you several times if you created any

21 notes or any kinds of records, and you said the only

22 thing you have are emails, ones you sent, ones that

23 were sent to you. Is that still accurate?

24 A. Yes. What I'm speaking about is a response to this

25 email.

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1 Q. Alright. But none that you recall?

2 A. Not off the top of my head.

3 MS. HARDY: Alright. Let the record
4 reflect I'm showing the witness and admitting into the
5 record Exhibit Number 8, which is an email from M.
6 Jackson to Anthony Eid dated Tuesday, January 15, 2019
7 at 10:58, Bates Stamped 384.

8 MARKED FOR IDENTIFICATION:

9 EXHIBIT 8

10 Email dated 1-15-2019 to
11 Anthony Eid from M. Jackson
12 2:00 p.m.

13 BY MS. HARDY:

14 Q. And this email is inviting Mr. Eid to go to
15 Mr. Jackson's office on January 25 at 10 a.m. to
16 review the documents that will be provided to the
17 Professionalism Committee. Can you please review this
18 and verify that you received this email?

19 MR. ROSSMAN: The question isn't what you
20 said before. You just want him to verify that he
21 received the email?

22 MS. HARDY: I want him to verify that he
23 received the email that I've identified for the
24 record.

25 THE WITNESS: Yes, I received this email.

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1 BY MS. HARDY:

2 Q. Okay. And you responded to that email on January 17

3 with an email back to Dr. Jackson; do you recall that?

4 A. I recall responding to this email.

5 Q. Do you recall saying to Dr. Jackson: I will see you

6 in your office on the 25th at 10 a.m. to review the

7 documents and the process. I am looking forward to

8 it.

9 A. That sounds like something I would write.

10 MS. HARDY: Alright. Let me show you the

11 email that I'm referring to. It's been marked as

12 Exhibit Number 9 for the record, and it's Bates

13 Stamped 386.

14 MARKED FOR IDENTIFICATION:

15 EXHIBIT 9

16 Email dated 1-17-2019 to

17 M. Jackson from Anthony Eid

18 attaching a letter dated 1-17-2019

19 to Anthony Eid from Matt Jackson

20 2:01 p.m.

21 THE WITNESS: Yes, I sent this email.

22 BY MS. HARDY:

23 Q. You sent the email dated January 17 at 9:04, correct?

24 A. Uh-huh, yes, that's correct.

25 MS. HARDY: Alright. So I'm marking as

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1 Exhibit Number 10 an email from M. Jackson to Anthony
2 Eid dated Friday, January 25, 2019, at 2:33 p.m., and
3 it's Bates Stamped 389.

4 MARKED FOR IDENTIFICATION:

5 EXHIBIT 10

6 Email dated 1-25-2019 to

7 Anthony Eid from Matt Jackson

8 2:02 p.m.

9 BY MS. HARDY:

10 Q. Will you verify that you received this email?

11 A. Yes, I received this email.

12 Q. Okay. And do you recall this discussion with

13 Dr. Jackson?

14 A. Yes, I do.

15 Q. Okay. And that was in connection with the fake
16 attorney letter and the purported 36th District filing
17 concerning Roe, correct?

18 MR. ROSSMAN: Object to the form of the
19 question; assumes facts not in evidence, misstates
20 prior testimony.

21 BY MS. HARDY:

22 Q. Please respond.

23 MR. ROSSMAN: If you understand the
24 question.

25 MS. HARDY: And that is an improper

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1 instruction to the witness to suggest he doesn't
2 understand.

3 MR. ROSSMAN: It's not improper.

4 MS. HARDY: That is exactly what I was
5 covering in the beginning of the dep that you took
6 such objection --

7 MR. ROSSMAN: That is an improper question,
8 and I was directing the witness he may answer the
9 question if he understands.

10 MS. HARDY: Counsel, you interrupted me.

11 MR. ROSSMAN: I apologize.

12 MS. HARDY: You would not let me provide
13 basic instructions at the beginning of the deposition
14 about the necessity of him letting me know if he does
15 not understand a question. It is not for you to
16 prompt him to say he doesn't understand a question.

17 MR. ROSSMAN: You're wrong about that. I
18 instructed you that your question was improper because
19 you're asking him questions about the instructions to
20 the deposition. If you wanted to state your
21 instructions on the record, that's fine, but when you
22 start asking him if he understands legally-based
23 instructions that find their origin in the Court
24 Rules, I have a problem with that. It calls for a
25 legal conclusion, and I also think it's intended to

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1 harass the witness.

2 Here you asked a question that I think
3 assumed facts that weren't in evidence. You raised
4 something that wasn't even spoken about earlier. So I
5 made my objection, and I indicated if he understands
6 the question, he can answer it. That's very normal in
7 depositions.

8 MS. HARDY: Are you done?

9 MR. ROSSMAN: Am I talking?

10 MS. HARDY: Alright. Sorry for all this
11 interference. I know it's hard for a witness to
12 concentrate.

13 MR. ROSSMAN: Please ask questions. You
14 need not apologize to this witness. You need not give
15 speeches. You are only allowed to ask questions.
16 That's the rules.

17 MS. HARDY: Alright. I am going to give
18 you just another message that if this kind of conduct
19 on your part continues, we are going to have to see
20 Judge Grand and get some ground rules about how
21 attorneys are to conduct themselves in depositions.
22 You are interfering, I believe, intentionally with my
23 ability to ask questions. You are interfering in a
24 way that's inappropriate with the witness' testimony,
25 and I can tell from the look on his face that you're

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1 actually interfering with your own client's
2 concentration because there is not an opportunity for
3 him to hear my questions before you are interfering
4 with long speeches.

5 MR. ROSSMAN: Okay. So if you want to
6 scare me away from objecting to your improper
7 compound, repeatedly compound, misleading, lacks
8 foundation, I mean, it's happened -- I'm letting it go
9 quite often actually, okay, because these are not good
10 questions. They're not. And then you give speeches
11 when you don't like the objections.

12 The interference here is not being caused
13 by me. It's caused by the questions that are being
14 asked. You go and ask the same question over and over
15 again, and I think that I would have good grounds as I
16 mentioned earlier to have this conducted under court
17 supervision because you would never get away with this
18 in a trial or in front of a judge. You don't get to
19 talk at witnesses. You don't get to shout people
20 down. You don't get to tell them that their
21 objections are wrong and apologize to the witness for
22 their lawyer interfering in the deposition so you can
23 drive a wedge between us. I know these little games.
24 So proceed and please ask good questions.

25 MS. HARDY: Your objections are limited to

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1 the word "form".

2 MR. ROSSMAN: Assumes facts not in
3 evidence, misstates, harassing and argumentative,
4 asked and answered I let you get away with. After a
5 while you only get so much time under the Court Rules.

6 MS. HARDY: I disagree with your
7 understanding of the rules in a deposition.

8 MR. ROSSMAN: I can tell by the type of
9 questions you're asking.

10 Proceed. It's your record.

11 BY MS. HARDY:

12 Q. Do you have Exhibit 10 in front of you still?

13 A. Yes.

14 Q. Okay. And this is, for the record, the email from
15 Dr. Jackson to you dated February 25 at 2:33, and it's
16 concerning the reformatting of the JPEGs which shows
17 the 36th District Court header, correct?

18 A. That is not correct.

19 Q. It states in its first sentence, quote: I was able to
20 reformat the JPEG showing the 36th District Court
21 header.

22 Is that correct; did I read that correctly?

23 A. That is. You read the date incorrectly. You said it
24 says February 25th instead of January 25th.

25 Q. Okay. Let me go back. You could have corrected me on

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1 the date at the time.

2 A. I'm doing my best here.

3 Q. If I misstate a date which happens in a deposition,
4 feel free to correct me, alright?

5 A. Uh-huh.

6 Q. I want to make sure we have a clear record.

7 So Exhibit Number 10, which is Bates
8 Stamped 389, is an email from M. Jackson to you dated
9 Friday, January 25, 2019 at 2:33, and it concerns the
10 36th District Court header that was presented to the
11 Professionalism Committee, correct?

12 A. Yes, that is correct.

13 Q. Okay. And that was what the attorney email from the
14 Wolff-Smith law firm was referring to, correct?

15 A. I do not think that is correct.

16 Q. Well, the email and we can go back to that document
17 now. Put that in front of you.

18 So let's go back to Exhibit Number 3. Do
19 you have that in front of you?

20 A. Exhibit Number 3?

21 Q. Yes. It is the email from Wolff Law to a name that
22 has been redacted.

23 A. I do not have that in front of me.

24 MR. ROSSMAN: Which number?

25 MS. HARDY: 3.

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1 BY MS. HARDY:

2 Q. So let's go over this letter. This purports to be

3 from Alexander Wolff-Smith, correct?

4 A. That's what it says.

5 Q. Okay. And it purports that Alexander Wolff-Smith

6 represents you, correct?

7 A. Correct.

8 Q. In an ongoing Small Claims Court action, correct?

9 A. That's what it says.

10 Q. Okay. And it indicates that that Small Claims Court

11 action has been filed in the 36th District Court,

12 correct?

13 A. That's what it says.

14 Q. And it indicates that there is going to be a hearing

15 and that failure to appear could result in a default

16 judgment under Michigan law which could be up to

17 \$5,000, correct?

18 A. That's what it says.

19 Q. And it encourages the recipient of Exhibit 3 to settle

20 this matter out of court, correct?

21 A. Yes.

22 Q. Alright. And it professes that the interactions

23 between the recipient of this email and

24 Mr. Wolff-Smith's client had resulted in malicious

25 hacker activity, correct?

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1 A. That's what it says, yes.

2 Q. Okay. And again, it iterated that if they want to
3 settle this case out of court, to contact the lawyer,
4 and they provide phone numbers, correct, the last
5 sentence?

6 A. No, that is not correct.

7 Q. Let me read it: If you wish to settle this out of
8 court, you may contact my client at 248.310.8610.
9 Otherwise, he'll see you in court on 11-15-2018.

10 Correct?

11 A. That is what it says, yes.

12 Q. Was that your phone number?

13 A. That is my phone number, yes.

14 Q. Okay. So when you were meeting with Dr. Jackson to
15 review all the materials that had been provided to the
16 Professionalism Committee in connection with their
17 deliberations, one of the documents they had was a
18 header from the 36th District Court referring to the
19 matter that's referenced in Exhibit 3, correct?

20 A. No, that's not correct.

21 Q. Alright. So tell me what's not correct about that?

22 A. There are multiple things not correct with it.

23 Q. What are they?

24 A. One, I did not get to review all of the documents that
25 were presented to the Professionalism Committee at

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1 that point.

2 Q. Correct.

3 A. I was not able to review all the documents given to
4 the Professionalism Committee at that point.

5 Second is this header that this email is
6 talking about, what Dr. Jackson told me was provided
7 by Amanda in the form of a screenshot -- I'm sorry,
8 you can strike that from the record.

9 It was Roe that provided it through a
10 screenshot on her phone.

11 Q. Alright. You wanted to correct the header; isn't that
12 accurate?

13 A. I wanted to correct that the header was not sent from
14 me, which is what Dr. Jackson thought.

15 Q. And how did you do that?

16 A. In our meeting, I told him it was not sent from me.

17 Q. And you were telling him that you had never sent a
18 screenshot of the header to anyone, including Roe; is
19 that correct?

20 A. I did not provide the screenshot.

21 Q. Did you tell Dr. Jackson that you were not responsible
22 for sending the screenshot to Roe?

23 A. The screenshot of the header, correct, of this 36th
24 District Court header?

25 Q. Right.

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1 A. Yes, that's correct.

2 Q. So did you ever send anything to Roe concerning a 36th
3 District Court filing?

4 A. No, I did not. I did not.

5 Q. You threatened her with a 36th District Court filing,
6 correct?

7 A. I would not use those terms, no.

8 Q. You told her you were going to file a 36th District
9 Court filing against her if she did not cooperate by
10 providing the information you were requesting of her,
11 correct?

12 A. No, I did not.

13 Q. You contacted her on October 26th, the day after
14 Exhibit Number 3 was sent by the Wolff-Smith law firm
15 to her and told her that you would rather settle the
16 matter out of court, correct?

17 A. I do not think so, no.

18 Q. What did you mean you don't think so?

19 A. I do not think that the dates you are stating are
20 correct, and I do not think the context of the message
21 that you're stating is correct.

22 Q. What's wrong about the date?

23 A. I am not sure what the date is.

24 Q. You can't recall right now?

25 A. Exactly.

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1 Q. And what's wrong about the content of my question?

2 A. I never threatened, never told her specifically that I
3 was going to sue her in any court.

4 Q. Are you claiming you never told her that you were
5 considering suing her or you ever made any reference
6 to suing her?

7 MR. ROSSMAN: Objection; compound.

8 THE WITNESS: I told her that she may hear
9 from a lawyer, but I never said anything to her in
10 relation to a specific suit with the 36th District
11 Court.

12 BY MS. HARDY:

13 Q. You never mentioned the 36th District Court in any of
14 your communications with Roe?

15 A. I do not believe at this point that I did.

16 Q. Alright. So when you saw the 36th District Court
17 header in your meeting with Dr. Jackson on January 25,
18 what did you have to say about it?

19 A. I said I had no idea what it was.

20 Q. Then did he fill you in; did he give you any
21 information about it?

22 A. He told me that it was something provided by Roe to
23 him.

24 Q. Alright. Did he provide any other information?

25 A. No.

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1 Q. So you're looking at a 36th District Court header?

2 A. Yes.

3 Q. And not having any idea according to your testimony

4 what it related to or where it came from other than

5 Roe had provided it?

6 A. That is correct.

7 Q. And did you ask any questions about what the

8 significance was of it, what did it concern?

9 A. I did.

10 Q. What did you ask?

11 A. I asked what did this concern.

12 Q. Alright. And what was the response?

13 A. He said he couldn't go into it with me.

14 Q. Alright. So what documents do you claim you saw when

15 you were in the meeting with Dr. Jackson on the 25th?

16 A. The only document that I saw was this header that he

17 sent me which contained the list of, I guess, people

18 due in court on that day and Ms. Camaj's initial

19 report.

20 Q. Alright. So he showed you a header and the Camaj

21 report?

22 A. Yes.

23 MS. HARDY: Alright. I'm going to mark as

24 Exhibit Number 11 the Camaj report which is dated

25 December 4, 2018, and it's Bates Stamped 221 through

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1 244.

2 MARKED FOR IDENTIFICATION:

3 EXHIBIT 11

4 Letter dated 12-4-2018 from

5 Nikolina Camaj with attachments

6 2:17 p.m.

7 BY MS. HARDY:

8 Q. Take a moment and review Exhibit Number 11.

9 Have you taken sufficient time to review

10 Exhibit 11?

11 A. Yes.

12 Q. Alright. And are these the documents that you were

13 shown which are referred to as the Camaj report?

14 A. No.

15 Q. Alright. What do you claim you were not shown that is

16 part of Exhibit 11?

17 A. I was shown the first five pages.

18 Q. So you're testifying under oath that you were not

19 shown when you were meeting with Dr. Jackson pages 231

20 through 244?

21 A. I believe I was also shown 242 to 244, but I was not

22 shown 231 -- sorry -- 231 to 241.

23 Q. Alright. So in advance of today's deposition, have

24 you ever seen pages 231 to 241 of Exhibit 11?

25 A. Yes, I've seen them in this complaint.

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1 Q. What do you mean complaint?

2 A. I'm sorry, I've seen them in this report.

3 Q. As part of the Camaj report?

4 A. Yes.

5 Q. When did you first see pages 231 through 41?

6 A. Ms. Camaj showed me some of these during our meeting.

7 Q. During your meeting with her on November 30th, 2019?

8 A. Yes.

9 Q. Which ones did she show you on that date?

10 A. I don't remember which ones she showed me, but she

11 showed me some of them. It certainly wasn't all of

12 these.

13 Q. How do you know it wasn't all of them if you don't

14 recall which ones you saw and which ones you did not

15 see?

16 A. Because there weren't ten pages of text messages that

17 she showed me.

18 Q. And you have no way of identifying which ones you did

19 see when you were meeting with Ms. Camaj, correct?

20 A. I do not remember, that is correct.

21 Q. You did not submit a statement to the Professionalism

22 Committee beyond what you had submitted previously on

23 December 4 to Ms. Camaj, is that correct, you did not

24 submit an additional statement to the Professionalism

25 Committee?

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1 A. That is incorrect.

2 Q. Alright. So you did submit an additional statement?

3 A. Yes, they asked for a statement.

4 Q. Okay. And what was the date of that?

5 A. The date of what, the meeting?

6 Q. Of the statement that you provided, when you provided
7 it and the date of the statement?

8 A. I do not remember when I wrote it or when I sent it,
9 but it was shortly before the hearing with the
10 Professionalism Committee.

11 Q. Do you have a copy of that statement?

12 A. It has been sent to you already.

13 MS. HARDY: We're going to take a break for
14 a moment.

15 (Recess taken at 2:23 p.m.)

16 (Back on the record at 2:27 p.m.)

17 MS. HARDY: Counsel, we have double-checked
18 the production, and we do not have any statement that
19 was written for the Professionalism Committee.

20 MS. VINCENT: It was included in the
21 Complaint.

22 MR. ROSSMAN: Can you find it by Bates?

23 MS. HARDY: I have the Complaint right
24 here, so tell me what paragraph you're referring to.

25 (Off the record at 2:29 p.m.)

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1 (Back on the record at 2:30 p.m.)

2 BY MS. HARDY:

3 Q. Alright. So for clarification on the record, have you
4 confirmed that the document you used as a statement
5 with the Professionalism Committee was the same
6 statement dated December 4, 2019, that you submitted
7 to Ms. Camaj in connection with the investigation?

8 A. No.

9 MS. HARDY: Counsel, what's the Bates
10 Number of the document?

11 MS. VINCENT: It is 284 through 288.

12 MS. HARDY: And what is the title of that
13 document?

14 MS. VINCENT: At the top it says: Dear
15 Members of the Promotions Committee.

16 BY MS. HARDY:

17 Q. That's the essence of the problem. My question
18 concerns the Professionalism Committee, not the
19 Promotions Committee. You understand the difference,
20 correct?

21 A. I understand the difference.

22 Q. The document your counsel just referred to is Dear
23 Members of the Promotions Committee, and that was
24 submitted in connection with your appeal from the
25 Professionalism Committee, correct?

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1 A. No, that's not correct.

2 Q. You didn't submit a document to the Promotions
3 Committee during the midst of the Professionalism
4 Committee process, did you?

5 A. No, I did not. It was not referred to that committee
6 yet.

7 Q. Alright. So how is it that the document that's
8 entitled Dear Members of the Promotions Committee
9 could have been the document that you submitted to the
10 Professionalism Committee?

11 A. Because it's the same document, just titled
12 differently. The Promotions Committee asked for the
13 same document that I submitted to the Professionalism
14 Committee.

15 Q. Alright. Do you have a copy of what you submitted to
16 the Professionalism Committee that does not say Dear
17 Members of the Promotions Committee?

18 A. I would have to look.

19 Q. Well, you didn't entitle the document that you gave to
20 the Professionalism Committee Dear Members of the
21 Promotions Committee, did you?

22 A. No, I did not.

23 Q. What did you entitle it?

24 A. I do not remember but it probably said Dear Members of
25 the Professionalism Committee.

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1 MS. HARDY: Okay. And now I'm directing my
2 question to counsel. You have a document 284 to 288
3 Bates Stamped by your side that says Dear Members of
4 the Professionalism Committee?

5 MS. VINCENT: No, that's the one he was --

6 MS. HARDY: Do you have what he's referring
7 to?

8 MS. VINCENT: No.

9 MS. HARDY: Alright. Well, if you have
10 such a document, I'm sure you'll produce it forthwith,
11 but we don't have it as a document that's been
12 previously produced.

13 MR. ROSSMAN: We'll review our files and
14 indicate whether we have it or we don't have it, okay?

15 MS. HARDY: Thank you. Let the record
16 reflect I am marking as Exhibit Number 12 an email
17 from M. Jackson to Anthony Eid, cc'ing Richard Baker
18 and others, dated Monday, February 11, 2019.

19 MARKED FOR IDENTIFICATION:

20 EXHIBIT 12

21 Emails attaching a letter dated

22 2-11-2019 to Anthony Eid from

23 Matt Jackson

24 2:33 p.m.

25 BY MS. HARDY:

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1 Q. Can you please take a moment and review this document
2 for the record. It has been Bates Stamped 409 through
3 412. Please look at the entire email exchange.

4 A. Yes, I received this letter.

5 Q. You received the letter and the email, correct?

6 A. Yes.

7 Q. Okay. And you were notified through these
8 communications of the fact that the Professionalism
9 Committee had decided to refer your case to the
10 Promotions Committee with a recommendation for
11 dismissal, correct?

12 A. That's correct.

13 Q. Alright. And they attached a letter to you dated
14 February 11th, 2019, entailing the decision-making
15 process, correct?

16 A. No, that is not correct.

17 Q. The letter which has been Bates Stamped 410 to 411
18 addressed to you from Dr. Jackson was received by you,
19 correct?

20 A. Yes.

21 Q. Look at page 412. You indicate that you had offered
22 to undertake a five-step plan for self improvement
23 that you brought to the committee; do you see that?

24 A. Yes.

25 Q. Is that accurate?

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1 A. That is accurate.

2 Q. Okay. And you brought that five-step plan to the
3 Professionalism Committee, correct?

4 A. Yes.

5 Q. And what had you committed to do in your five-step
6 plan?

7 A. The details of that plan are in the letter to the
8 Professionalism Committee, which is the same letter as
9 the one that's to the Promotions Committee.

10 Q. Let me just clarify that point for a moment. The
11 letter given to the Professionalism Committee that we
12 don't have a copy of that you've referenced in your
13 testimony was absolutely identical in content to the
14 letter that was sent Dear Members of the Promotions
15 Committee?

16 A. I believe it was the same except for that title that
17 you just read.

18 Q. Okay.

19 A. But I believe the rest of the contents were the same.

20 MARKED FOR IDENTIFICATION:

21 EXHIBIT 13

22 Letter to Dear Members of

23 the Promotions Committee

24 2:36 p.m.

25 MS. HARDY: For the record I'm going to

ANTHONY EID
July 21, 2021

1 show the witness Exhibit Number 13 which is a document
2 entitled Dear Members of the Promotions Committee, and
3 it is Bates Stamped 777 through 781.

4 BY MS. HARDY:

5 Q. I want you to review it and make sure that your
6 testimony is accurate that the only differences are
7 the title of the document and not the substance.

8 A. There are actually additions to this letter from what
9 was given to the Promotions Committee.

10 Q. From what was given to the Promotions Committee or to
11 the Professionalism Committee?

12 A. I'm sorry. There are additions from what was given to
13 the Professionalism Committee.

14 Q. What were the additions?

15 A. On page 779, the second paragraph I believe is an
16 addition that talks about the Professionalism
17 Committee's recommendation.

18 On page 780, I believe numbers 6 and 7 of
19 the five-step plan you were referring to were in
20 addition.

21 I believe page 781 was an addition.

22 Q. So there were quite a few differences between the
23 document you provided to the Professionalism Committee
24 versus the Promotions Committee?

25 A. Yes, it seems that way.

ANTHONY EID
July 21, 2021

1 Q. But you're still certain there was an independent
2 document that went to the Professionalism Committee?

3 A. There was for sure. The school has it if I don't.

4 Q. Well, you have it, though, more importantly, correct?

5 A. I'd have to look to make sure that I have it.

6 Q. Well, did you retain all your documents or just some
7 of your documents?

8 A. No. I retained all of them. It's possible that I
9 used that document as a template for this document.

10 Q. What computer did you prepare the Professionalism
11 Committee document on?

12 A. On my PC that we spoke about earlier.

13 Q. And on what computer did you prepare your Promotions
14 Committee document?

15 A. The same PC.

16 Q. The same PC?

17 A. Yes.

18 MS. HARDY: I'm going to mark as Deposition
19 Exhibit Number 14 a document entitled In Conclusion,
20 and that was produced by plaintiff and Bates Stamped
21 AE000289 to 290.

22 Just to clarify, the last exhibit I gave
23 you should say Exhibit 13 on it, not 12. I mismarked
24 it.

25 MARKED FOR IDENTIFICATION:

ANTHONY EID
July 21, 2021

1 EXHIBIT 14

2 Document titled In Conclusion

3 2:41 p.m.

4 BY MS. HARDY:

5 Q. I'm providing Exhibit Number 14 to counsel and the
6 witness. Please review this document.

7 A. Yes, I wrote this document.

8 Q. Alright. Did you draft this on your PC?

9 A. Yes.

10 Q. Same one you've referred to previously?

11 A. Yes.

12 Q. Okay. And did you submit this to the Promotions
13 Committee?

14 A. Yes.

15 Q. Is it your testimony you submitted it in writing or
16 you read it during the hearing process?

17 A. I do not remember exactly how I submitted it, but I
18 know I was not given the opportunity to read it to the
19 committee.

20 Q. Alright. So let me go back and correct my question.

21 Did you submit this to the Professionalism Committee
22 or the Promotions Committee?

23 A. No. This was submitted to the Promotions Committee.

24 Q. Alright. So this was submitted after you received
25 notification about the decision of the Professionalism

ANTHONY EID
July 21, 2021

1 Committee and you appealed to the Promotions
2 Committee?

3 A. I did not appeal to the Promotions Committee. The
4 appeal to the Promotions Committee came after the
5 Promotions Committee decided to dismiss me.

6 Q. When you went from the Professionalism Committee to
7 the Promotions Committee, the first step, do you
8 consider that a review or an appeal?

9 A. I do not consider that appeal.

10 Q. Do you consider it a review?

11 A. I consider that my case was sent to the Promotions
12 Committee.

13 Q. Alright. And on what basis do you testify it's not an
14 appeal?

15 A. Because the appeal of the Promotions Committee came
16 after that committee's decision to dismiss me. There
17 was more documentation submitted for the appeal.

18 Q. Are you ruling out that there's two steps to the
19 appeal process?

20 MR. ROSSMAN: I'm just going to object to
21 the question as it calls for a legal conclusion to
22 which no answer is required.

23 BY MS. HARDY:

24 Q. I'm actually asking about internal School of Medicine
25 policy and practice. Where did you acquire the

ANTHONY EID
July 21, 2021

1 understanding that when a decision of the
2 Professionalism Committee goes to the Promotions
3 Committee, that it is not considered an appeal?

4 MR. ROSSMAN: Same objection and vague.

5 BY MS. HARDY:

6 Q. Just answer the question if you can.

7 A. Yeah, it was never -- the word appeal was never used
8 when I went from the Professionalism to the Promotions
9 Committee.

10 Q. Alright. So you submitted Exhibit 13 to the
11 Promotions Committee after it was considering the
12 decision or the recommendation of the Professionalism
13 Committee, correct?

14 A. That is correct.

15 Q. Alright. And Exhibit Number 14, which is the In
16 Conclusion document is one that you claim you actually
17 submitted in writing to the Promotions Committee or
18 you just conveyed verbally?

19 A. I am not sure. I do not remember if it was submitted
20 in writing. However, I did try to convey it verbally
21 until I was stopped.

22 Q. And what do you mean you tried to convey it?

23 A. During the hearing, I started reading this statement
24 and the other statement, but the administration
25 prevented me from reading.

ANTHONY EID
July 21, 2021

1 Q. Alright. Did you attempt to read Exhibit 13 as well
2 as Exhibit 14?

3 A. I was not given the opportunity to read it.

4 Q. Did you inform the members of the hearing committee
5 that you wanted to read Exhibit 13?

6 A. Yes.

7 Q. Alright. Who did you make that request to?

8 A. I was interrupted while reading these documents during
9 the committee hearing. I was told that because they
10 already had the material, that they didn't need to
11 hear me recite it.

12 Q. Okay. So you started to read Exhibit Number 13, and
13 then they asked you to stop because they already had
14 it?

15 A. I started to read Exhibit Number 14, and they asked me
16 to stop.

17 Q. What about 13, did you try to read that as well?

18 A. Because I was stopped, I didn't get the opportunity to
19 start reading Exhibit 13.

20 Q. Well, wait a minute. Exhibit 14 starts with In
21 Conclusion?

22 A. I understand.

23 Q. You started with In Conclusion before you tried to
24 read the opening letter which is 13?

25 A. I tried to read Exhibit 14 first.

ANTHONY EID
July 21, 2021

1 Q. Okay.

2 A. Why I titled it In Conclusion, I don't know at this
3 time.

4 Q. How far did you get in the reading process before they
5 indicated they did not need you to read the document?

6 A. Not very far.

7 Q. Do you know how far you got?

8 A. I do not.

9 Q. Did you start with In Conclusion?

10 A. I believe I started with the first sentence of the
11 first paragraph.

12 Q. Okay. And who asked you to stop?

13 A. I do not remember.

14 Q. Alright. And then you didn't even attempt to read
15 Exhibit 13, correct?

16 A. I was not given an opportunity to read it.

17 Q. Well, how do you know you're not given an opportunity
18 if you don't request an opportunity?

19 A. I was shut down from being able to speak.

20 Q. You were shut down from being able to speak at all in
21 the hearing?

22 A. Except to answer questions that the committee members
23 had of me.

24 MS. HARDY: Okay. We'll go back to that at
25 a later point. Let's proceed on with the documents in

ANTHONY EID
July 21, 2021

1 chronology.

2 Let the record reflect I am showing the
3 witness Exhibit Number 15 which is an email from
4 Mr. Eid to Ms. Jones dated February 21 and Bates
5 Stamped 444 and 445. 445 is an email from Ms. Jones
6 to Mr. Eid indicating that they need his statement by
7 tomorrow.

8 MARKED FOR IDENTIFICATION:

9 EXHIBIT 15

10 Email dated 2-21-2019 to
11 Ja Esta Jones from Anthony Eid
12 2:48 p.m.

13 MS. HARDY: I'm handing a copy to counsel
14 and to the witness.

15 BY MS. HARDY:

16 Q. Did you receive this email reflected on 445 from
17 Ms. Jones?

18 A. On 445?

19 Q. Yes.

20 A. Yes.

21 Q. Alright. And you responded that you've finalized the
22 letter and will have it for her by the end of the
23 workday tomorrow?

24 A. That is what my email to her says.

25 Q. Okay. And what letter are you referring to in your

ANTHONY EID
July 21, 2021

1 email of February 21?

2 A. I believe it was both Exhibit 13 and Exhibit 14.

3 Q. Okay. And did you submit those in writing then, or at
4 least did you submit Exhibit 13 in writing?

5 A. Yes.

6 Q. Via email or did you mail it, drop it off; how did you
7 get it to them?

8 A. No. It was via email.

9 Q. And that email indicates what you gave in writing to
10 the Promotions Committee?

11 A. The email should have the attachments to it that I
12 gave to the Promotions Committee.

13 Q. Okay. And do you have a copy of your email in your
14 possession?

15 A. I'd have to look. I do not know.

16 MS. HARDY: Let the record reflect I am
17 marking as Exhibit Number 16 a letter to Mr. Eid from
18 Dr. Richard Baker, Chair of the Promotions Committee,
19 and it's dated February 27, 2019, and this document is
20 Bates Stamped AE000303.

21 MARKED FOR IDENTIFICATION:

22 EXHIBIT 16

23 Letter dated 2-27-2019 to

24 Anthony Eid from Richard S. Baker

25 2:51 p.m.

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1 MS. HARDY: I'm handing a copy to the
2 witness and to counsel.

3 BY MS. HARDY:

4 Q. Do you recognize this letter?

5 A. I do recognize the letter.

6 Q. Okay. And you received it on or about February 27,
7 2019, correct?

8 A. I'm not sure about that.

9 Q. This is the letter that informs you that the
10 Promotions Committee has decided to dismiss you from
11 the School of Medicine, correct?

12 A. Yeah, this is one of two letters that were sent. I'm
13 not sure which one this is of the two.

14 Q. Did they send the same letter twice?

15 A. They sent two different versions of this letter, I
16 believe.

17 Q. Do you have the second version that you're referring
18 to?

19 A. I believe we included it already.

20 Q. Okay. And is the content different?

21 A. There were some differences. I do not recall what the
22 differences were.

23 Q. Anything of significance that you recall?

24 A. I'm not sure if it was significant or not.

25 Q. Anything that stands out sitting here today?

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1 A. Not that I recall.

2 MS. HARDY: Okay. I'm marking as Exhibit
3 Number 17 an email exchange between Mr. Eid and Vickie
4 Muhammad who is a manager and assistant to Dr. Richard
5 Baker and then an email at the top of page 452 from
6 Margit Chadwell.

7 MARKED FOR IDENTIFICATION:

8 EXHIBIT 17

9 Email dated 3-5-2019 attaching
10 an Update dated 3-5-2019 to
11 Anthony Eid from Vickie Muhammad
12 2:53 p.m.

13 MS. HARDY: I'm handing a copy to counsel
14 and to the witness.

15 BY MS. HARDY:

16 Q. Can you look at the bottom email carrying over to 453.

17 A. Yes, I sent this email to Dr. Baker.

18 Q. Alright. Did you have a meeting with him?

19 A. Yes.

20 Q. Okay. Do you know the date?

21 A. It was about a week or so after sending this email. I
22 think it was sometime in early March.

23 Q. Do you have a calendar that has all the dates of your
24 meetings with various members of the administration
25 about the dismissal proceedings?

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1 A. No.

2 Q. Was anyone present in the meeting other than yourself
3 and Dr. Baker?

4 A. No. It was just Dr. Baker and I.

5 Q. And how long was the meeting?

6 A. The meeting was about 25 minutes.

7 Q. What was the reason for the meeting?

8 A. I had submitted a list of questions to my counselor,
9 Ms. Robichaud. I think there were seven questions
10 about the dismissal process, and I had those same
11 questions for Dr. Baker.

12 Q. Did you put those questions in writing to
13 Ms. Robichaud?

14 A. I did.

15 Q. Alright. And did you send them to her in an email?

16 A. I did.

17 Q. And you have that email?

18 A. It has already been sent to you.

19 Q. Okay. And was Ms. Robichaud not able to answer the
20 questions?

21 A. She was not.

22 Q. Alright. So did you address them all to Dr. Baker?

23 A. We talked about every single one of them during our
24 meeting.

25 Q. Alright. And did you take any notes during the

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July 21, 2021

1 meeting or after the meeting to memorialize the
2 substance of the meeting?

3 A. I did not take any notes.

4 Q. Do you have an audio recording?

5 A. No.

6 Q. So you were just operating off of recall in terms of
7 what was said in the meeting?

8 A. I relayed what I said with Dr. Baker to Ms. Robichaud
9 in a subsequent meeting.

10 Q. Verbally to Ms. Robichaud?

11 A. In person, yes.

12 Q. And did you take notes concerning that meeting?

13 A. No.

14 Q. Do you have an audio recording?

15 A. I tried to take a -- no, I do not.

16 Q. You tried to audio record?

17 A. I pulled out my phone, and Ms. Robichaud had told me
18 that there will not be any audio recordings and to put
19 my phone away.

20 Q. Alright. And you did so?

21 A. I did put my phone away, yes.

22 Q. You didn't surreptitiously record that meeting?

23 A. I do not have recordings.

24 MR. ROSSMAN: Hold on. That's an
25 argumentative question. Objection.

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1 MS. HARDY: It's just a question.

2 MR. ROSSMAN: I'm just noting my objection
3 for the record as you slide words into your question
4 that are unfair and suggest things that are not in the
5 record.

6 MS. HARDY: I expressly want to know
7 whether he recorded something secretly.

8 MR. ROSSMAN: Asked and answered.

9 BY MS. HARDY:

10 Q. The answer is no?

11 A. The answer is no.

12 Q. Alright. Did you ever record any communications with
13 Wayne State University School of Medicine officials or
14 someone on the main campus secretly?

15 A. No.

16 Q. Alright. So let's go to the meeting with Dr. Baker.
17 What do you recall about your meeting with Dr. Baker?

18 A. I recall a few things. I recall Dr. Baker saying that
19 he knows that this is hard. The specific words he
20 used were: Oh, well, you've been at the top of the
21 mountain and now you're at the bottom.

22 I asked him what he thinks I should do. He
23 told me that he thought that I could run for Governor.
24 I asked him about the appeals process to the
25 Promotions Committee. That was the most -- that was

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1 the most -- that was the reason why I wanted to meet
2 with him is to get more information on the appeals
3 process of the Promotions Committee's decision, and I
4 also wanted to learn about if I would still be allowed
5 to take exams and have those grades recorded during
6 the appeals process.

7 Q. Alright. And what did you learn in response to your
8 questions?

9 A. Dr. Baker told me that I would still be able to
10 withdraw from the university if I appealed the
11 Promotions Committee's decision as long as I didn't
12 take it one further step and appeal to the Provost
13 office. He also told me that I would be able to take
14 exams and that those grades would count on my
15 transcript.

16 I also remember being rather confused
17 throughout the meeting because I did not understand up
18 until that point, I did not understand at all, still
19 don't understand, what the Promotions Committee
20 thought I did, and I asked Dr. Baker about this, and
21 he said he could not get into what the Promotions
22 Committee thought that I did.

23 Q. Alright. So you were at the time you talked to
24 Dr. Baker in the dark in terms of what the Promotions
25 Committee thought you had done that had a bearing on

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1 your professionalism?

2 A. Yes.

3 Q. Do you recall anything else about the meeting with

4 Dr. Baker, anything that he said?

5 A. I think we've gone over all of the important points of

6 that meeting.

7 Q. You went ahead and appealed the decision of the

8 Promotions Committee within the Promotions Committee?

9 A. Yes, that is correct.

10 Q. Alright. And your statement that you had previously

11 submitted to the Promotions Committee was revamped and

12 then resubmitted as part of your appeal?

13 A. I do not remember if the original letter was revamped

14 or if a new letter was started.

15 Q. It was largely the same?

16 A. No. There was much added to my appeal.

17 MS. HARDY: Alright. So let me mark as

18 Exhibit 18 an email from Loretta Robichaud to Margit

19 Chadwell which the subject is Dismissal Decision

20 Appeal Letter and Evidence, and it is forwarding an

21 email from Anthony Eid to Richard Baker, subject,

22 Dismissal Decision Appeal Letter and Evidence, which

23 is dated March 20th, 2019, and it starts with the

24 line, Attached you will find the appeal to my

25 dismissal letter, and it's Bates Stamped 566 through

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1 614.

2 MARKED FOR IDENTIFICATION:

3 EXHIBIT 18

4 Dismissal Decision Appeal

5 Letter and Evidence

6 3:02 p.m.

7 BY MS. HARDY:

8 Q. This has not only the appeal letter but the
9 attachments. So can you identify these documents that
10 are part of Exhibit 18 as the documents that you
11 submitted in connection with your appeal to the
12 Promotions Committee?

13 Let's start with 566 which is page 1 or the
14 first page of 18. Did you draft that email to
15 Dr. Baker?

16 A. Yes.

17 Q. Alright. And then did you attach to that email pages
18 567 through 614?

19 A. Yes, I did.

20 Q. Alright. And take the time to be sure that these are
21 all the documents that you submitted and that nothing
22 is missing and that nothing has been added.

23 A. Yes, I believe everything in here are documents that I
24 submitted to the Promotions Committee for my appeal of
25 their dismissal decision.

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1 Q. Alright. And there's nothing additional that's absent
2 from this packet, correct?

3 A. I believe there was an addendum submitted to Dr. Baker
4 and Ms. Robichaud that had two more pages.

5 Q. Two screenshots?

6 A. No. One was a letter of support and the other was
7 another statement that Ms. Robichaud had asked me to
8 touch on.

9 Q. Okay. I'll get to that in a moment. Those documents
10 were submitted after the documents attached to
11 Exhibit 18?

12 A. That's correct.

13 Q. Alright. So look at pages 598 through 601. Those are
14 text messages?

15 A. Yes.

16 Q. Alright. Where did you get those text messages?

17 A. Those are from my phone.

18 Q. Who are you texting with in those messages?

19 A. That is my mother.

20 Q. Alright. And what led to you filing an appeal letter
21 addendum?

22 A. I had gotten a letter of support, so that covers that,
23 and in a subsequent meeting with Ms. Robichaud, she
24 had asked me to touch on this allegation that I had
25 not known about the Snapchat accounts. So I submitted

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1 an addendum about that as well.

2 Q. Okay. And tell me about your conversation about the
3 Snapchat account with her; what did she say to you and
4 you say to her?

5 A. Well, I had a meeting with Ms. Robichaud. I don't
6 remember if it was before or after I submitted this
7 packet of evidence to the committee.

8 Q. And you're referring to Exhibit 18?

9 A. Exhibit 18, yes, that's correct. We had a few
10 meetings during that time period, and at one of those
11 meetings, she asked me if I knew anything about a
12 Snapchat account belonging to Amanda, and up until
13 that point, that was the first time I had been asked
14 that question, and I told her no, and then she asked
15 me to write a letter about it to include to the
16 committee.

17 Q. And that's what you addressed in the appeal letter
18 addendum which has been marked as Exhibit Number 19?

19 A. I'd have to review it.

20 MS. HARDY: I thought I had given it to
21 you.

22 MARKED FOR IDENTIFICATION:

23 EXHIBIT 19

24 Appeal Letter Addendum

25 3:08 p.m.

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1 MS. HARDY: A copy for the witness and one
2 for counsel.

3 THE WITNESS: Yes, this addendum was in
4 reference to that conversation with Ms. Robichaud.

5 BY MS. HARDY:

6 Q. Alright. And this concerned the issue related to some
7 photos that had been taken of Ms. Roe, correct, and
8 whether or not you tried to access those photos?

9 A. I do not believe that's what this was for, no.

10 Q. So what was this Snapchat issue? Describe it.

11 A. I believe this is the allegation that I somehow
12 accessed Roe's Snapchat account.

13 Q. And was there any particular concern about you
14 accessing the account; I mean, was there an issue such
15 as photos of Ms. Roe?

16 A. There was no issue that was brought up to me at any
17 point in this process before, about any Snapchat
18 account, until I had that conversation with
19 Ms. Robichaud.

20 Q. That's the point in time we're dealing with, and that
21 concerned an issue about whether or not you were
22 trying to get a hold of photos of Roe through
23 Snapchat, correct?

24 A. I am not sure if it was photos or anything else on the
25 Snapchat account.

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1 Q. Why are you addressing photos in Exhibit Number 19 if
2 you have no idea what the Snapchat concern was about?

3 A. Well, I have photos, videos, or any other content
4 related to Roe.

5 Q. Well, you were aware that photos was an issue,
6 correct?

7 A. Photos are taken on Snapchat.

8 Q. You are specifically aware that there was a concern
9 that you may have attempted to view or obtain photos
10 of Roe, and you wanted to make it clear that you never
11 did and that would be a very disgusting act and gross
12 statement that literally makes you sick to your
13 stomach?

14 MR. ROSSMAN: Object to the form of the
15 question; impartial reading of the document.

16 THE WITNESS: That specific concern was
17 never stated to me.

18 BY MS. HARDY:

19 Q. Why are you addressing it in Exhibit Number 19 if it
20 was never stated to you?

21 A. Because photos are stored on Snapchat account.

22 Q. Alright. So it's your testimony that prior to writing
23 Exhibit Number 19, you had no idea that anyone thought
24 that you may have tried to access photos of Roe
25 through Snapchat?

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1 A. Not until I had the conversation with Ms. Robichaud
2 where she asked me to address it.

3 Q. Alright. And she asked you to address it before you
4 wrote Exhibit Number 19, correct?

5 A. This exhibit was written due to that conversation.

6 Q. Okay. And in that conversation, she told you there is
7 a concern that you were trying to get at photos of Roe
8 through her Snapchat account?

9 A. That is incorrect. She never stated photos. She just
10 said there was a concern that I was trying to get
11 access to her Snapchat account.

12 Q. Alright. So why are you addressing the issue of
13 photos in Exhibit 19 if she had never mentioned photos
14 in connection with Snapchat, and why are you making
15 the following statement, quote: This is a disgusting
16 act and a gross statement that literally makes me sick
17 to my stomach and acts like this goes against every
18 fiber in my body, every fiber of my being and does not
19 line up with my history or my personality?

20 A. Well, because it does.

21 Q. Why are you making that statement if you had no reason
22 to believe that there is a concern about you trying to
23 access photos of Roe on her Snapchat?

24 A. I didn't know if it was photos, videos, other content
25 that could be on Snapchat. There's a lot of things

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1 that can happen on Snapchat.

2 Q. So you're just covering all possible bases in

3 Number 19?

4 A. Yes.

5 MS. HARDY: Let the record reflect I'm
6 providing the witness with Exhibit Number 20 which are
7 two pages, consists of two pages Bates Stamped
8 AE000277 and 275.

9 MARKED FOR IDENTIFICATION:

10 EXHIBIT 20

11 Screenshots

12 3:13 p.m.

13 BY MS. HARDY:

14 Q. Do you recognize these two screenshots?

15 A. Yes.

16 Q. Alright. Did you provide these to the School of
17 Medicine in connection with your promotions appeal?

18 A. Yes.

19 Q. Alright. And when did you take the screenshot which
20 is AE000277?

21 A. I do not remember when I took this particular
22 screenshot.

23 Q. Alright. I'm going to need a date, you know, from the
24 phone as we requested with the prior screenshot. Do
25 you have this on your phone still?

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1 A. I am not sure if I still have this on my phone or not.

2 Q. Alright. Look at AE000275. Do you recall when that
3 screenshot was taken?

4 A. It was taken along with the 00277.

5 Q. Same time?

6 A. Yes.

7 Q. Alright. Do they concern the same event?

8 A. Yes.

9 Q. Alright. And do you know the date of the event?

10 A. No, I do not.

11 Q. Do you know the month or year?

12 A. It was in 2018.

13 Q. Do you know the month?

14 A. I do not.

15 Q. Alright. And is this your, from your perspective, the
16 evidence that Roe had accessed your Apple account?

17 A. This is one of the pieces that made me suspect that
18 Roe was behind my unauthorized access.

19 Q. Alright. And the other one we have previously -- no
20 -- strike that. I'll go to the next one in a moment.

21 So you did not provide these to Ms. Camaj,
22 correct?

23 A. No.

24 Q. Alright. And you did not provide these to the
25 Professionalism Committee?

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1 A. No.

2 Q. Alright. You waited until the appeal of the

3 Promotions Committee stage to provide these, correct?

4 A. These, yes, that is true.

5 Q. And the third one, correct?

6 A. That is true, yes.

7 Q. Did you provide just these two to the Promotions

8 Committee?

9 A. No. I provided about -- I provided everything that

10 was in Exhibit 18 to the Promotions Committee, and all

11 of it was the first time that I had presented this

12 type of evidence to that committee or any of the

13 committees at the School of Medicine.

14 Q. And why did you wait until that point in the process

15 to provide what you thought was evidence that somehow

16 explained your conduct and excused it?

17 A. Can you clarify that question?

18 Q. Why did you wait until that point in the process to

19 provide evidence that you thought was exculpatory?

20 A. I was a busy medical student taking exams with a lot

21 of responsibilities. Getting this evidence took a

22 very large amount of time, and I thought that my

23 events of the story -- I guess I just didn't submit it

24 to them before that stage.

25 Q. Alright. What was time consuming about providing

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1 Exhibit 20?

2 A. Well, I did not only provide Exhibit 20. I provided a
3 lot of exhibits.

4 Q. Was Exhibit 20 time consuming to provide?

5 MR. ROSSMAN: Object to form.

6 THE WITNESS: All of the exhibits in
7 totality took a large amount of time to provide.

8 BY MS. HARDY:

9 Q. Alright. Did you provide the screenshots that are
10 part of Exhibit 20 after Exhibit 18?

11 A. No. I included them in Exhibit 18.

12 Q. Were they part of the addendum, or were they yet a
13 separate submission?

14 A. No. They were included in the exhibit on page 573 and
15 572.

16 MS. HARDY: Okay. I see Exhibit 20 as part
17 of Exhibit 18.

18 So I'm going to mark as Exhibit Number 21
19 another screenshot and one that you produced in
20 discovery but is not part of Exhibit 18 or the
21 addendum that you provided to the Promotions
22 Committee.

23 MARKED FOR IDENTIFICATION:

24 EXHIBIT 21

25 Apple ID Sign In Requested

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1 3:20 p.m.

2 BY MS. HARDY:

3 Q. So when did you discover this screenshot?

4 A. This was the same event.

5 Q. This is different, though, than 20, the two
6 screenshots that are part of Exhibit 20?

7 A. Yes, but it was the same event, which is why I didn't
8 include it in addition. I thought it was redundant.

9 Q. Alright. But you did produce it in discovery; you did
10 not provide it to Wayne State School of Medicine
11 during the consideration of the complaint against you,
12 but you did produce it in discovery, correct?

13 A. Like you said, Exhibit 21 was not included in either
14 Exhibit 18 which had all the evidence that I submitted
15 during my appeal to the Promotions Committee.

16 Q. And you didn't submit it independent of Exhibit 18,
17 either, correct?

18 A. No.

19 MS. HARDY: I need to take a quick break
20 for a moment.

21 (Recess taken at 3:21 p.m.)

22 (Back on the record at 3:27 p.m.)

23 MS. HARDY: I'm going to mark as Exhibit
24 Number 22 an email from Vickie Muhammad to Mr. Eid
25 dated April 10, 2019, advising him of the decision of

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1 the Promotions Committee and attaching a letter to
2 Mr. Eid from Richard Baker, MD, Chair of the
3 Promotions Committee.

4 MARKED FOR IDENTIFICATION:

5 EXHIBIT 22

6 Email with a letter dated
7 4-10-2019 to Anthony Eid
8 from Richard S. Baker attached
9 3:28 p.m.

10 BY MS. HARDY:

11 Q. Can you confirm for the record that you received the
12 communications that have been marked as Exhibit
13 Number 22, and they are received on April 10, 2019,
14 correct?

15 A. I did receive this letter. However, I do not know
16 when exactly I received it.

17 Q. Well, the email conveying that it is attached is dated
18 April 10, 2019, and that's page 670, correct?

19 A. That's what it says, yes.

20 Q. Are you doubting that it was attached to the email?

21 A. I thought that I had read this email later than
22 April 10th.

23 Q. Well, you could have opened it later than April 10,
24 but do you have any reason to doubt that it was
25 received by you on April 10th?

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1 A. No.

2 MS. HARDY: Let the record reflect I'm
3 showing the witness communications between Mr. Eid and
4 President Wilson's office concerning his appeal before
5 the Promotions Committee, and it's Bates Stamped 694
6 through 700.

7 MARKED FOR IDENTIFICATION:

8 EXHIBIT 23

9 Emails

10 3:29 p.m.

11 MS. HARDY: I'm providing a copy to counsel
12 and to the witness.

13 BY MS. HARDY:

14 Q. Please look through these documents, and once you have
15 had a chance to refresh your memory as to their
16 content, then I will begin my questioning.

17 A. Yes, I sent and received this thread of emails.

18 Q. Alright. So these emails concern your attempt to draw
19 President Wilson into your situation?

20 MR. ROSSMAN: Object to the form of the
21 question; mischaracterizes the evidence.

22 BY MS. HARDY:

23 Q. Correct, you were trying to get him involved?

24 MR. ROSSMAN: Object to the form.

25 THE WITNESS: No.

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1 BY MS. HARDY:

2 Q. What were you trying to do if you weren't trying to
3 get him involved?

4 A. I say here: Hello, Allison. I just want you clear, I
5 was not going to ask President Wilson to get involved
6 in the appeals process at all. I was just looking for
7 an advocate as I have not had one throughout this
8 entire process.

9 Q. Well, what were you asking the President of Wayne
10 State University -- strike that.

11 Why were you asking the President of Wayne
12 State University to be your advocate in the appeals
13 process?

14 A. Because I did not have an advocate throughout the
15 entire process.

16 Q. Why did you think it would be appropriate for the
17 President of the entire university to become an
18 advocate for you in the course of your appeal?

19 MR. ROSSMAN: Objection; misstates facts
20 not in evidence.

21 BY MS. HARDY:

22 Q. Go ahead and answer.

23 A. He is the President of the university.

24 Q. Why would he become -- why would it be appropriate for
25 him to become an advocate for a specific student who

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1 is subject to a proceeding such as the one that you
2 were involved in?

3 MR. ROSSMAN: I'm going to object to the
4 question because it lacks foundation. He never
5 testified anything about the propriety of this, and
6 that's not coaching. I just need to point out to you
7 --

8 MS. HARDY: That is coaching.

9 MR. ROSSMAN: I'm pointing it out to you
10 because the question invokes --

11 MS. HARDY: I don't need a lecture. You
12 have an objection at your disposal which is called
13 form. That's all you need to say.

14 MR. ROSSMAN: You're trying to mislead this
15 witness. I know what you're up to.

16 MS. HARDY: Alright. This is my last
17 cautionary message to you about your conduct and your
18 inappropriate interference.

19 MR. ROSSMAN: And this is my last
20 cautionary warning to you to ask appropriate
21 questions.

22 MS. HARDY: We're ceasing this deposition.
23 We're done. I'm going to file a motion with the
24 Magistrate, present this transcript, and ask for an
25 instruction from the Magistrate to limit you to form

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1 objections and otherwise appropriate conduct so that I
2 can proceed without your inappropriate intrusions.

3 MR. ROSSMAN: So you're terminating the
4 deposition?

5 MS. HARDY: I am terminating the
6 deposition.

7 MR. ROSSMAN: Let the record reflect that
8 counsel for the defendant is terminating this
9 deposition over our objection to terminating the
10 deposition. The witness has given several hours of
11 testimony today, and we're going to object to the
12 continuation of this deposition under any
13 circumstances other than court supervision.

14 MS. HARDY: I'll file my motion, and we
15 will wait for a ruling from Magistrate Grand.

16 MR. ROSSMAN: And as we can see by the
17 record in this case, counsel is floundering greatly in
18 the questioning. Her frustration is not with me.
19 It's with the answers that the witness is giving and
20 she doesn't like. That's the motive behind cancelling
21 this deposition so that she can prepare for the
22 deposition in a second session rather than take the
23 last two-and-a-half hours of testimony today, and if
24 you want three-and-a-half, we'll give you
25 three-and-a-half.

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1 MS. HARDY: I'm terminating the deposition
2 until we get an instruction from Judge Grand about
3 what is appropriate conduct by counsel in a
4 deposition.

5 MR. ROSSMAN: Let the record reflect that
6 we object to the termination of this deposition. We
7 presented the witness for testimony. He is ready,
8 willing, and able, and we will sit here as they walk
9 out of the room, and I'd like to stay on the record as
10 they depart from the room. I am not stipulating to
11 close this record until you walk out of this room.

12 MS. HARDY: You know, this is my office.
13 I'm not departing my conference room. I am telling
14 you that the deposition has been terminated until we
15 can get a ruling from the Magistrate on your conduct.

16 MR. ROSSMAN: Let the record reflect that
17 we're here, sitting here ready to be deposed. We're
18 not leaving.

19 MS. HARDY: You know, I don't understand
20 what you're doing. Just sitting here is not going to
21 change the outcome.

22 MR. ROSSMAN: We're here. If you want
23 testimony, he's here.

24 MS. HARDY: I have terminated the
25 deposition, and now I am asking you to please leave

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1 the premises.

2 MR. ROSSMAN: Okay. Let the record reflect
3 that we're being asked to leave the premises, and
4 we'll be filing a motion to continue this under
5 supervision of Judge Grand because your conduct during
6 this deposition in terms of your questioning, your
7 witness admonishments, sarcastic comments, facial
8 expressions and statements designed to harass and
9 intimidate this witness are improper. So we'll go to
10 the judge, and we'll leave as we're being asked to do
11 by counsel, but let the record reflect that we
12 absolutely are here ready, willing, and able to
13 testify.

14 Are we still on the record?

15 COURT REPORTER: Yes, we are still on the
16 record until both counsel agree to go off the record.

17 MR. ROSSMAN: We can stay on the record
18 until we walk out.

19 Have a nice day everyone.

20 (The deposition was concluded at 3:36 p.m.
21 Signature of the witness was not requested by
22 counsel for the respective parties hereto.)
23
24
25

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CERTIFICATE OF NOTARY

STATE OF MICHIGAN)

) SS

COUNTY OF MACOMB)

I, LEZLIE A. SETCHELL, certify that this
deposition was taken before me on the date
hereinbefore set forth; that the foregoing questions
and answers were recorded by me stenographically and
reduced to computer transcription; that this is a
true, full and correct transcript of my stenographic
notes so taken; and that I am not related to, nor of
counsel to, either party nor interested in the event
of this cause.

LEZLIE A. SETCHELL, CSR-2404

Notary Public,

Macomb County, Michigan.

My Commission expires: April 17, 2024

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